EPA REGISTRATION NO. 87659-1

#13
B43

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 9, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MS. JANE M. MILLER
BIOLOGIC INC, AGENT FOR
CINMAX INTERNATIONAL LLC
115 OBTUSE HILL RD
BROOKFIELD, CT 06804-

Dear Ms. Miller:

Subject: Transfer of Pesticide Registrations From Company Number 35935 to Company Number 87659

Pursuant to your request in your letter and transfer agreement of June 23, 2010, we have approved the transfer of the following registrations from **NUFARM LIMITED**, company number **35935** to **CINMAX INTERNATIONAL LLC**, company number **87659**.

The effective date of these changes is the date of this letter.

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
GLYPHOSATE ACID TECHNICAL	35935-36	87659-1

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number.

If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental

distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

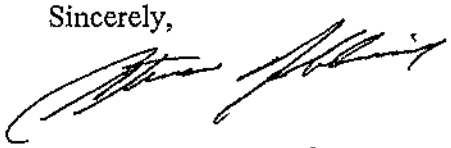
With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted.

If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

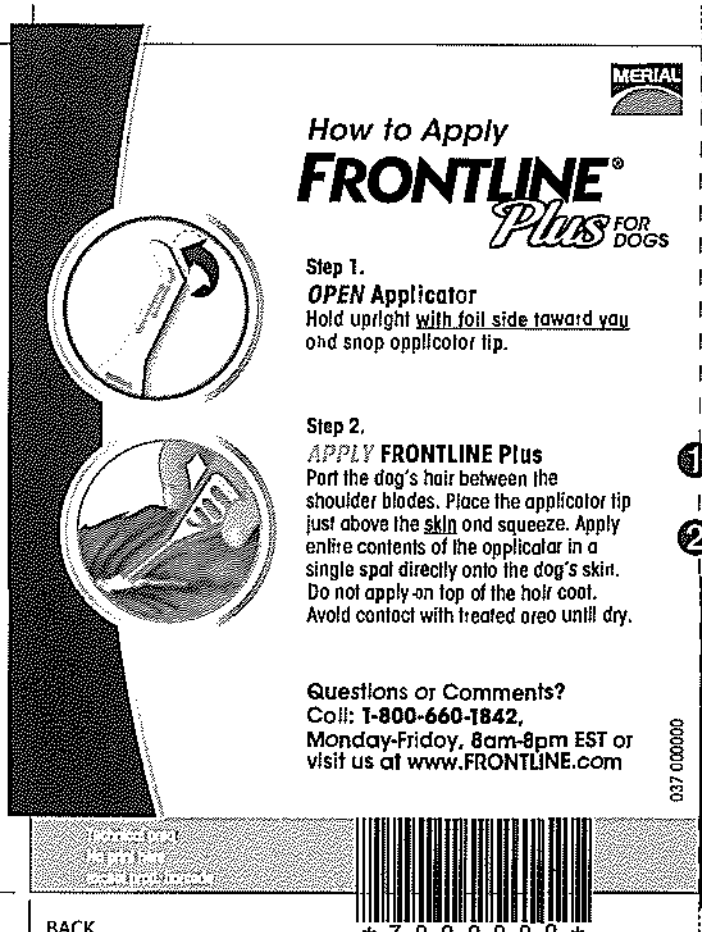
Sincerely,



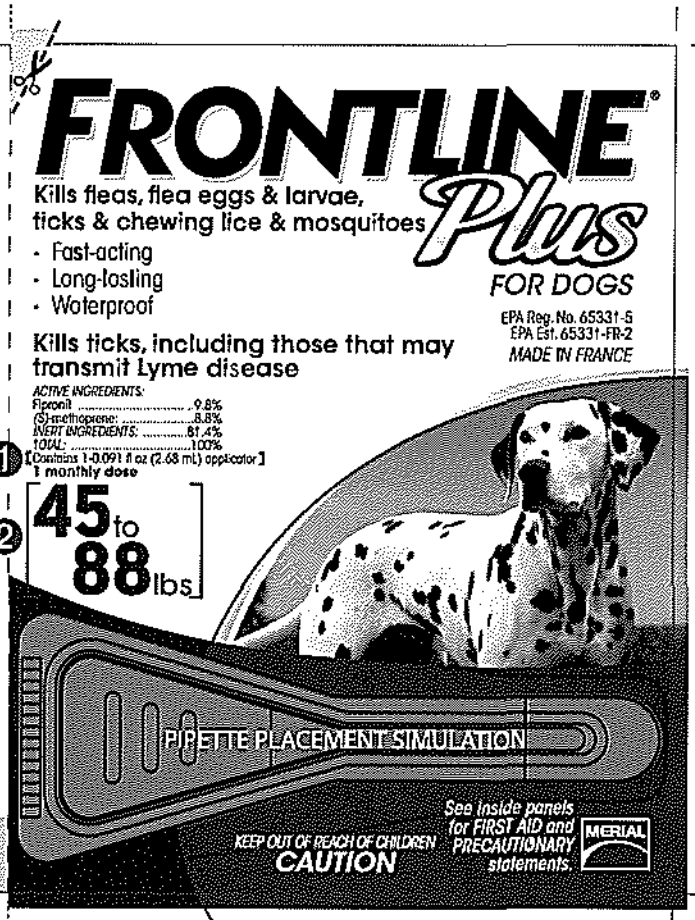
Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MR. WILLIAM M. MAHLBURG
NUFARM LIMITED, AGENT FOR
NUFARM LIMITED
P.O. Box 13439
RTP, NC 27709

RE: L_35935_REG_87659_08_09_2010



BACK



FRONT

FRONTLINE® Plus FOR DOGS

For *DOGS & PUPPIES* 8 weeks or older:
Fast-acting, long-lasting, waterproof treatment and control of fleas, flea eggs & larvae, ticks, chewing lice, sarcoptic mites and mosquitoes.

ACTIVE INGREDIENTS

fipronil:	9.8%
(S)-methoprene	8.8%
INERT INGREDIENTS	81.4%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

FRONTLINE® Plus for Dogs:

Fleas
- Kills fleas, flea eggs and flea larvae
- Prevents all flea stages (eggs, larvae, pupae) from developing
- Stops existing infestations and prevents establishment of new infestations
- Kills fleas which may cause flea allergy dermatitis

Ticks
- Kills all life stages of ticks (larva, nymph and adult), including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), lone star ticks (*Amblyomma americanum*) and deer ticks (*Ixodes scapularis*)
- Kills ticks that may transmit Lyme disease, Rocky Mountain Spotted Fever, haemobartonellosis, ehrlichiosis, babesiosis, anaplasmosis and other tick-borne diseases

Lice
- Rapidly eliminates chewing lice infestations

Mites
- Aids in control of sarcoptic mange infestations

Mosquitoes
- Kills mosquitoes

FRONTLINE Plus is approved for use on all dogs, including:
- Breeding, pregnant, and lactating bitches
- Puppies as young as 8 weeks

One spot application is all that's needed:

FRONTLINE Plus spreads from the single point of application, rapidly covering the entire dog and localizing in the hair, on the surface of the skin and in the sebaceous glands. These glands act as a reservoir, continuously replenishing FRONTLINE Plus onto the skin and hair coat, so that it keeps working even if the dog gets wet.

Fleas, ticks and chewing lice are killed quickly after coming into contact with a treated dog. Fleas and ticks do not need to bite the dog in order to die.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not allow children to apply product. ***TO PREVENT HARM TO YOU AND YOUR PET, READ ENTIRE LABEL AND DIRECTIONS BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON DOGS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS.***

To kill fleas, flea eggs & larva, ticks, chewing lice and mosquitoes apply FRONTLINE Plus for Dogs as follows:

- *OPEN* Applicator

Hold upright with foil side toward you and snap applicator tip.

- *APPLY* FRONTLINE Plus

Part the dog's hair between the shoulder blades. Place the applicator tip just above the skin and squeeze. Apply entire contents of the applicator in a single spot directly onto the animal's skin. Do not apply on top of the hair coat. Avoid contact with treated area until dry.

FRONTLINE Plus is approved for use on all dogs, including breeding, pregnant, and lactating bitches and puppies as young as 8 weeks.

FRONTLINE Plus remains effective even after bathing, water immersion, or exposure to sunlight.

FREQUENCY OF APPLICATION

When used monthly, FRONTLINE Plus completely breaks the flea life cycle and controls tick and chewing lice infestations. Do not reapply FRONTLINE Plus for 30 days.

FRONTLINE Plus kills adult fleas, flea eggs, and flea larvae for up to three months. FRONTLINE Plus also prevents development of all flea stages for up to three months. FRONTLINE Plus can control fleas for up to three months, however, if there is a high risk of reinfestation or if the pet has fleas which may cause flea allergy dermatitis, a once monthly application may be needed.

FRONTLINE Plus kills ticks for at least one month. A once monthly application is recommended where tick control is needed.

FRONTLINE Plus kills all life stages of ticks (larva, nymph and adult). FRONTLINE Plus kills ticks that may transmit Lyme disease, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, anaplasmosis and other tick-borne diseases.

FRONTLINE Plus kills chewing lice for at least one month. A once monthly application is recommended where chewing lice control is needed.

FRONTLINE Plus aids in the control of sarcoptic mange infestations. Multiple monthly treatments are recommended for the elimination of mites.

FRONTLINE Plus kills mosquitoes within 24 hours for up to 7 days, and within 48 hours for up to 28 days with a monthly application.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

STORAGE. Store unused product in original container, out of reach of children and animals.

PESTICIDE DISPOSAL. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

CONTAINER DISPOSAL. If empty: Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS. CAUTION.

Harmful if swallowed. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

HAZARDS TO DOMESTIC ANIMALS.

For external use only. Do not use on puppies under 8 weeks of age. Individual sensitivities, while rare, may occur after using any pesticide product. Pets may experience some temporary irritation at the site of product application. If signs persist, or become more severe within a few days of application, consult a veterinarian immediately. If your pet has an unusual reaction to the initial application, consult a veterinarian before repeating treatment. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated, debilitated or aged animals. Call 1-800-660-1842, Monday-Friday, 8am-8pm EST.

PHYSICAL OR CHEMICAL HAZARDS
COMBUSTIBLE: Do not use or store near heat or open flame.

HOW SUPPLIED

For easy and convenient treatment, FRONTLINE Plus for Dogs is available in sizes for small dogs and puppies 8 weeks or older and up to 22 lbs., medium dogs 23–44 lbs., large dogs 45–88 lbs., and extra large dogs 89–132 lbs.

WARRANTY

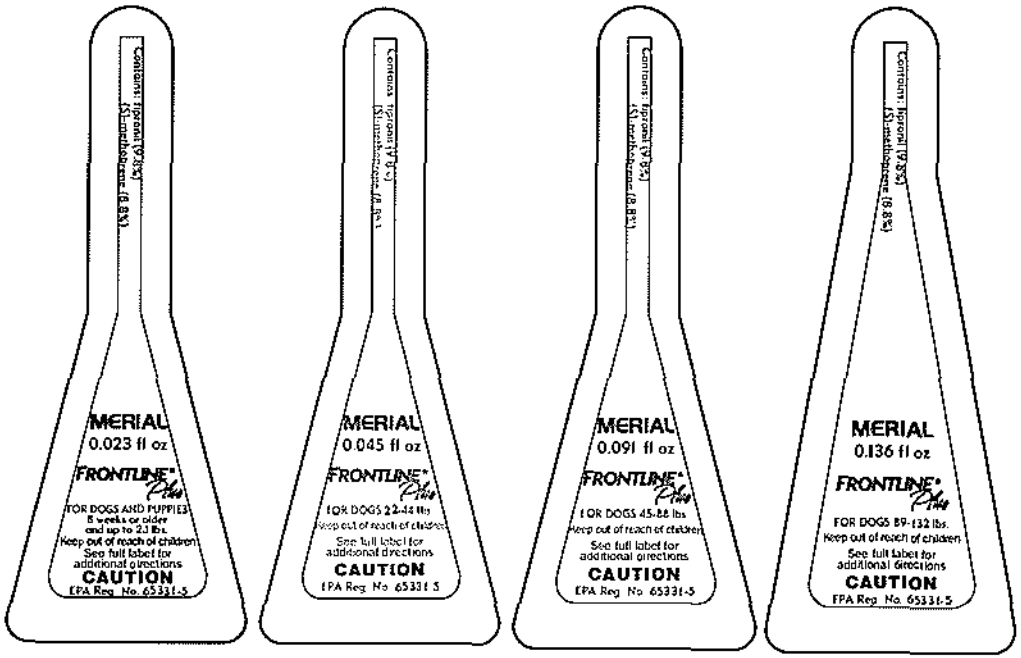
Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and handling of this material when such use and handling are contrary to label instructions.

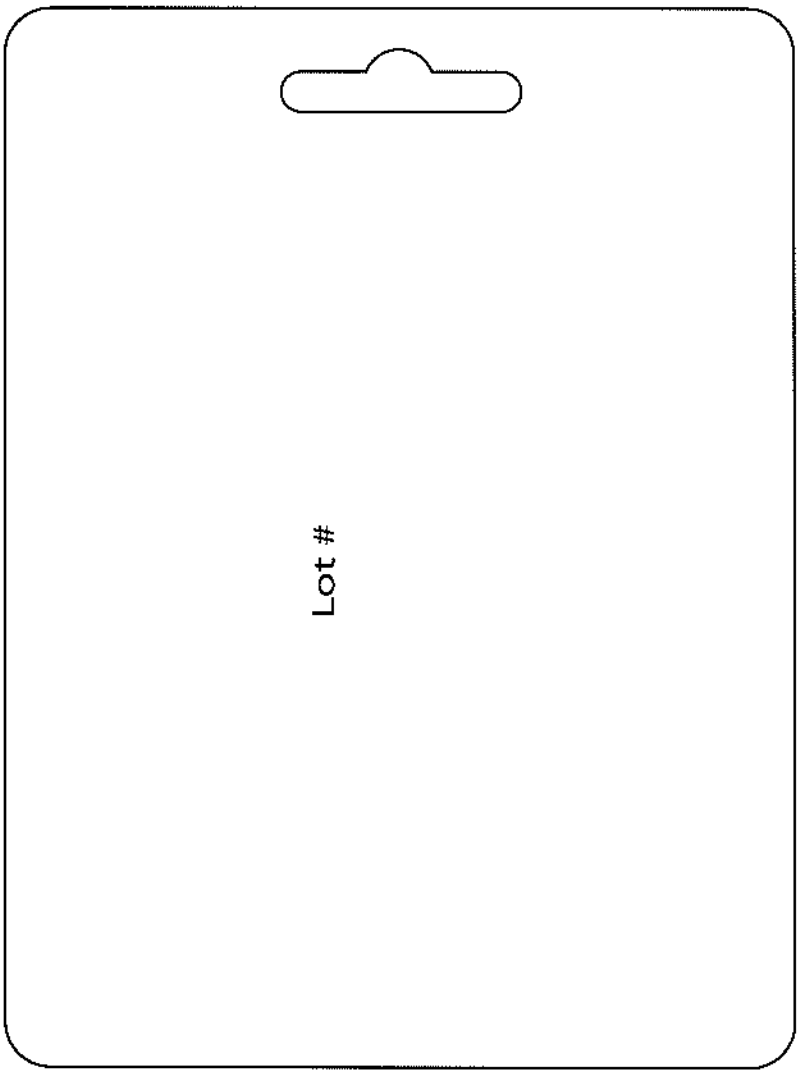
Merial Limited
3239 Satellite Blvd.
Duluth, GA 30096-4640, USA

INSIDE PANELS

1
Contains 1-0.023 fl oz (0.67 mL) applicator
Contains 1-0.045 fl oz (1.34 mL) applicator
Contains 1-0.136 fl oz (4.02 mL) applicator

2 *For DOGS & PUPPIES 8 Weeks or Older and up to*
22 lbs
23 to 44 lbs
89 to 132 lbs


Contains: fipronil (9.8%)
(S)-methoprene (8.8%)
MERIAL
0.023 fl oz
FRONTLINE Plus
FOR DOGS AND PUPPIES
8 weeks or older
and up to 2.0 lbs.
Keep out of reach of children
See full label for
additional directions
CAUTION
EPA Reg. No. 65331-5
Contains: fipronil (9.8%)
(S)-methoprene (8.8%)
MERIAL
0.045 fl oz
FRONTLINE Plus
FOR DOGS 2.2-44 lbs
Keep out of reach of children
See full label for
additional directions
CAUTION
EPA Reg. No. 65331-5
Contains: fipronil (9.8%)
(S)-methoprene (8.8%)
MERIAL
0.091 fl oz
FRONTLINE Plus
FOR DOGS 45-88 lbs
Keep out of reach of children
See full label for
additional directions
CAUTION
EPA Reg. No. 65331-5
Contains: fipronil (9.8%)
(S)-methoprene (8.8%)
MERIAL
0.136 fl oz
FRONTLINE Plus
FOR DOGS 89-132 lbs.
Keep out of reach of children
See full label for
additional directions
CAUTION
EPA Reg. No. 65331-5


Lot #

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 6 2007

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

I, Jim Tompkins, Herbicide Branch, Registration Division, Office of Pesticide Programs, Office of Prevention, Pesticides and Toxic Substances, United States Environmental Protection Agency ("EPA"), certify that the pesticide product(s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Panama) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Nufarm Americas Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527 USA

EPA Registration Number: 35935-36
Name of Product: Glyphosate Acid Technical

Sincerely,

Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505P)

Nufarm

Nufarm Americas Inc.
Jeannie K. Smith
Vice President
Registrations & Regulatory Affairs
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630 455-2018
jeannie.smith@us.nufarm.com

January 9, 2007 via overnight courier

Document Processing Desk
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S4900 One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: **Mr. Jim Tompkins, PM-25**
Herbicide Branch

Subject: Gold Seal Certificates

Please forward to my attention one (1) gold seal certificate on EPA letterhead stating that the following Nufarm label is registered with the EPA. We intend to use this certificate in Panama.

Product Name	EPA Reg. No.
Glyphosate Acid Technical	**35935-36**

Send the certificate to my attention at:

Jeannie Smith
Nufarm Americas Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527 USA

Should you have any questions, please telephone me at 630 455-2018.

Thank you,

Jeannie Smith
Vice President

GLYPHOSATE ACID TECHNICAL

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:	
N-(phosphonomethyl)glycine	98.0%
OTHER INGREDIENTS:	2.0%
TOTAL	100.0%

EPA Reg. No. 35935-36 EPA Est. No. 73432-CHN-001

KEEP OUT OF REACH OF CHILDREN
DANGER

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. HARMFUL IN INHALED. Do not get in eyes or on clothing. Avoid breathing dust. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	• Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person. • Call a poison control center or doctor immediately for treatment advice.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified prior to the discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

The active ingredient in this product is a non-selective broad spectrum herbicide. Do not handle or use in a manner that can result in accidental contact with desirable vegetation.

DIRECTIONS FOR USE

Read entire label before using. It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For formulation into end-use herbicide products intended for the following uses:

1. Fallow ground, sod, pastures, rangelands, and noncrop areas including: aquatic and wetland sites, rights of way, industrial, recreational and public areas, farmsteads, forestry site preparation and release programs, eucalyptus and hybrid poplar production, site preparation or directed sprays for the floor or ornamental nurseries and Christmas tree farms, rights of way (ROW), Conservation Reserve Program (CPR), turfgrasses and grasses for seed production.
   Residential Sites
   Row Crops: including corn, cotton, peanuts, sorghum, soybeans, sugarcane, barley, buckwheat, millet, oats, rice, rye, teosinte, triticale, wheat, and wild rice.
   Forage Crops: alfalfa, clover, forage grasses, and forage legumes.
   Tree and Vine Crops: general weed control, middles (between rows of trees), strips (in rows of trees), selective equipment (except kiwi), perennial grass suppression.
   Vine Crops: grapes and kiwi fruit.
   Citrus Fruits: including calamondin, chironja, citron, grapefruit, kumquat, lemon, lime, mandarin orange, orange, pummelo, tangelo, tangerine, and tangors.
   Tree Nuts: including almond, beechnut, Brazil nut, butternut, cashaw, chestnut, chinquapin, filbert (hazelnut), hickory nut, macadamia nut, pecan, pistachio, and walnut.
   Pome Fruits: including apple,, crabapple, loquat, meyhew, pear and quince.
   Stone Fruits: including apricots, cherry nectarine, peach, plum, and pruno.
   Small Fruits and Berries: including blackberry, blueberry, boysenberry, cranberry, currant, dewberry, elderberry, gooseberry, huckleberry, loganberry, olalieberry, raspberry, and youngberry.
   Fruiting Vegetables: including eggplant, groundcherry, papino, pepper (all) tomatillo and tomato.
   Cucurbit Vegetables: including cantaloupe, casaba melon, chayote, Chinese waxgourd, citron melon, cucumber, Cronshaw melon, gherkin, edible gourds, honeydew melon, honeyball melon, mango melon, melons (all), muskmelon, Persian melon, pumpkin, squash, and watermelon.
   Root and Tuber Vegetables: including artichoke (Jerusalem), beat greens, baets (garden, sugar), carrots, celsriac, chicory, ginseng, horseradish, oriental radish, parsnips, potatoes, radish, rutabagas, salsify, shallot, sweet potato, turnips, and yams.
   Bulb Vegetables: including garlic, leek and onions.
   Leafy Vegetables: including amaranth, arrugula, cardoon, celluco, chervil, chrysanthemum, corn salad, cress, dandelion, dock (sorrel), endive, fennel (Florence), lettuce (head ad leaf), parsely, purslane, rape greens, rhubarb, and spinach (all).
   Brassica Leafy Vegetables: including broccoli (all), Brussels sprouts, cabbage (all), cabbage (Chinese), cauliflower, cavalo broccoli, celery, celery (Chinese), chard (Swiss), collards, endive, kale, kohlrabi, mizuna, mustard greens, and mustard spinach.
   Legume Vegetables: including beans (all), lentils, chickpeas, paes (all), groundcherry, guer, and pepino.
   Other Crops: including asparagus, canola, litchi nuts, mint (peppermint, spearmint), olives, okra, sunflower, and watercress.
   Tropical Crops: acarola, astomoya, avocado, banana (plantains), breadfruit, canistel, carambola, cherimoya, cocoa beans, coconut, coffee, dates, durian, figs, genip, guava, jabolicaba, jacktruit, longan, lychee, mango, manosteen, papaya, passion fruit, persimmons, pineapple, pomegranate, rambutan, sapodilla, sepota (black, mamey, white), soursop, sugar apple, tamarind, and tea.
   Herbs: peppermint and spearmint.
2. Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
3. Uses for experimental purposes that are in compliance with US EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store in original container only. Do not store near heat or open flame. In case of spill or leak, sweep up and dispose of waste.
PESTICIDE DISPOSAL: Open dumping is prohibited. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Triple rinse (or equivalent). Then off for recycling or dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitations of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The directions for use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of Nufarm Americas Inc. or Seller. To the extent consistent with applicable law, all said risks shall be assumed by Buyer and User,, and Buyer and User agree to hold Nufarm Americas Inc. and Seller harmless for any claims relating to such factors.

Nufarm Americas Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Nufarm Americas inc., and Buyer and User assume the risk of any such use. NUFARM AMERICAS INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent permitted by law, Nufarm Americas Inc. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF NUFARM AMERICAS INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF NUFARM AMERICAS INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

NUFARM AMERICAS INC. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitations of Warranty and of Liability, which may not be modified except by written agreement signed by a duly authorized representative of Nufarm Americas Inc. (RV092606)

NET CONTENTS:

MANUFACTURED FOR:
NUFARM LIMITED
SURR RIDGE, IL 60527

Nufarm

FEE

Date: September 7, 2006

SUBJECT: Product Chemistry Review of Glyphosate Acid Technical TGAI/MUP

FROM: Shyam B. Mathur, PhD
Product Chemistry Team Leader
Technical Review Branch/RD (7505C)

9/7/06

TO: Erik Kraft / Jim Tompkins, RM 25
Herbicide Branch / RD (7505C)

DP BARCODE: D327137
DECISION No.: 364894
File Symbol No.: 73432-R
PRODUCT: Glyphosate Acid Technical TGAI/MUP
PCC: 417300
REGISTRANT: Zhejiang Xinan Chemical Industrial Group Co., Ltd, PR China
USE: Herbicide, Food use

INTRODUCTION:

The consultant Biologic Incorporation, on behalf of the registrant, Zhejiang Xinan Co., has submitted the product chemistry data to support the registration of the proposed TGAI/MUP Glyphosate Acid technical produced in PR of China. The registrant has submitted the product chemistry data corresponding to 830 series Subgroup A and subgroup B for the proposed acid technical. Based on the five batch analytical data, the registrant has provided the CSF for basic formulation (dated 01-25-06). The product chemistry data submitted have been assigned MRID Nos. 467605-01, 467605-02 (volume 1 to 7), 467605-03, and 467605-4. The registrant has claimed that the proposed glyphosate technical acid is substantially similar to the registered technical glyphosate with Reg. No. 524-420.TRB has been asked to evaluate the product chemistry data submitted for Glyphosate acid technical and determine its similarity to the registered technical glyphosate.

SUMMARY OF FINDINGS:

1. The registrant has submitted a Confidential Statement of Formula for basic formulation (dated 01-25-06) for the glyphosate acid technical TGAI / MUP. The average purity of the technical/MUP as determined by five batch analysis of samples from five locations is 98.0%. The proposed certified limits for the AI are based on the five batch analysis. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.155 and 158.175 respectively [MRID No. 467605-01 & 467605-02].

2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.160 [MRID No. 467605-01].

3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.162. The glyphosate acid was manufactured at site located in PR China [redacted] The details of the production process have been provided [MRID No. 467605-01].

Manufacturing process information may be entitled to confidential treatment

4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.167. The synthetic pathway used to produce of glyphosate acid technical in PR China may result in the formation of [redacted].

5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.170. The study was conducted under GLP requirements in compliance with 40CFR§160. Five representative batches (from PR China site) of the glyphosate acid technical were analyzed for percent active ingredient and the associated impurities. The glyphosate acid was derivatized [redacted]

The analytical methods were validated for accuracy, linearity, and precision. During the review of the 5 batch analysis few discrepancies were found by the reviewer in the results provided. The applicant and performing analytical laboratory were contacted. After checking the raw data, the performing laboratory recognized the errors and agreed to provide the corrected version of the report. The applicant later on submitted the revised preliminary analysis report and corrected the following pages of the report: 6, 7, 31, 33, 34, 44, 45, 1254 thru 1259 [MRID No. 467605-02, Volume 1 to Volume 7].

6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.180. The analytical method describes the procedure used to analyze the glyphosate technical by creating a fluorenylmethyl chloroformate (FMOC) derivative and then analyzing by HPLC equipped with a fluorescence detector at 260 nm excitation. The method was validated for precision, accuracy and linearity [MRID No. 467605-02, Volume 7of 7].

7. The data submitted corresponding to guideline 830 Series Subgroup B (physical-chemical properties) for the glyphosate acid technical satisfy the data requirements of 40CFR§158.190 [MRID No. 467605-03 and 467605-04].

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for Glyphosate acid technical TGAI / MUP and has concluded that:

1. All the product chemistry data submitted corresponding to 830 Series Subgroup A and Subgroup B are acceptable.

2. The CSF for basic formulation (dated 01-25-06) is acceptable.

[redacted]

4. The proposed technical glyphosate acid technical (File symbol No. 73432-R) was determined to be substantially similar to the registered glyphosate technical with Reg. No. 524-420. The proposed technical [redacted]

BARCODE:D327137; **Reg. No.** : 73432-R **PRODUCT**: Glyphosate acid technical TGAI/MUP

830.1550. **Product identity & Composition**: (MRID No. 467605-01)

Common Name: Glyphosate Acid Technical

Chemical Name: N-(phosphonomethyl)glycine

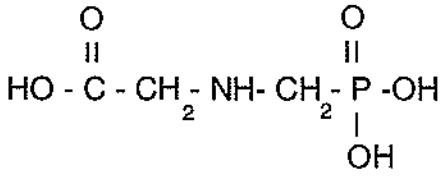
CAS No.: 1071-83-6

PC Code No.: 417300

Empirical formula: $C_3H_8NO_5P$

Molecular Weight: 169.1

Structural formula:



BARCODE:D327137; **Reg. No. :** 73432-R **PRODUCT:** Glyphosate Acid technical TGAI/MUP

Table 1. Manufacturing and Impurity Data for Glyphosate acid technical

GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	Basic CSF (01-25-06)	A	The NC of AI (98.0%) is supported by 5 batch analysis of the samples from the production site [redacted]
8301600	Description of materials used to produce the product	467605-01	A	The MSDS specifications for all starting material used for the synthesis of glyphosate have been provided by the registrant.
830.1620	Description of production process	467605-01	A	The production of glyphosate acid is a batch [redacted] been described in full details. The reaction conditions, amounts of chemicals in each step, duration of time, and the yields in each step have been provided. The QA steps involved in each step have been described.
830.1670	Discussion of formation of impurities	467605-01	A	Discussion takes into consideration the manufacture of the acid by two different [redacted]
830.1700	Preliminary analysis	467605-02 (vol 1 to 7)	A	The registrant has provided 5 batch analysis for the TGAI produced at Chinese site. The AI [redacted] The methods were validated for accuracy, linearity, and precision. The five batch analysis supported the CSF for basic formulation.
830.1750	Certified limits	Basic CSF 01-25-06	A	The proposed certified limits for the AI and the impurities are based on the five batch analytical results.
830.1800	Enforcement analytical method	467605-02 Vol 7 of 7	A	The AI was assayed by converting to its chloroformate derivative and analyzed by anion exchange HPLC using fluorescence detector at 260 nm and external standard.

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required

Manufacturing process information may be entitled to confidential treatment

BARCODE:D327137; **Reg. No. :** 73432-R **PRODUCT:** Glyphosate Acid technical TGAI/MUP

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties of : Glyphosate acid TGAI/MUP

GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	467605-03	A	White
830.6303	Physical state	" " "	A	Solid Crystalline powder
830.6304	Odor	" " "	A	None
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	467605-04	A	Stable at normal & elevated temperatures (54°C for 2 weeks). Stable to iron & Al metal and corresponding acetate salts.
830.6314	Oxidation/reduction: chemical incompatibility	467605-04	A	No reaction with water, monoammoinium phosphate, 20 mesh Zn granules, 87 octane un-leaded gasoline, and hydrogen peroxide. However, the test substance was non-compatible to potassium permanganate.
830.6315	Flammability		NA	
830.6316	Explodability		NA	
830.6317	Storage stability		G	
830.6319	Miscibility		NA	
830.6320	Corrosion characteristics		G	
830.7000	pH	467605-03	A	1.85 at 21°C (1% aqueous solution)
830.7050	UV/Visible absorption	467605-03	A	No measureable absorption at pH 2, 7 & 10 from 235 nm to 700 nm
830.7100	Viscosity		NA	
830.7200	Melting point	467605-03	A	210°C with decomposition
830.7220	Boiling point		NA	
830.7300	Dry Bulk Density	467605-03	A	834 kg/m^3 at 25°C
830.7370	Dissociation constants in water (DC)	467605-03	A	pKa = <2, 2.89, 5.77, 11.10 at 25°C
830.7550	Partition coefficient	467605-03	A	Log Ko/w = - 2.79 at pH 1.85 @ 25°C
830.7840	Water solubility:	467605-03	A	11,715 mg/L at 25°C
830.7950	Vapor pressure	467605-03	A	< 10^{-3} Pa @ 175°C

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Upgrade (additional information required)

BARCODE:D327t37; **Reg. No.** : 73432-R **PRODUCT**: Glyphosate Acid technical TGAI/MUP

830. t800. Enforcement analytical method: (MRID NO. 467605-02)

The HPLC method using pre-column fluorogenic labeling technique was utilized for the assay of the active ingredient. In this method the glyphosate was converted to its fluorenmethyl chlorformate (FMOC) derivative and then analyzing by HPLC equipped with a fluorescence detector at 260 nm. Details of the analytical method have been provided.

Equipment & Parameters

HPLC: HPLC equipped with a fluorescence detector and a column heater.
Column: Zorbax Sax Anion Exchange, 250 mm x 4.6 mm
Mobile phase: 50% acetonitrile : 50% 0.05 M KH_2PO_4 , pH adjusted to 3.0 with phosphoric acid and then to pH 4.0 with 7N KOH.
Column temperature: 40°C
Injection volume: 100 µL
Retention time: 7.1 minutes
Fluorescence excitation: 260 nm; emission: 320 nm filter

CONFIDENTIAL APPENDIX
BARCODE:D327137; **Reg. No. :** 73432-R **PRODUCT:** Glyphosate Acid Technical TGAI/MUP

Chemical	Glyphosate Acid Technical	Registration No.	73432-R	DP Barcode	D327137
CB Number		Product Type	98.0%	Test Substance	TGAI/MUP

Group A-GLNS 830.1550, 830.1600, 830.1620, 830.1650, 830.1670, 830.1700, 830.1750, & 830.1800: Composition (CSF), Impurities, Preliminary analysis, and Analytical Methods

Compound/Component			Nominal Concentration (% w/w)	Lower Certified limit concentration (% w/w)	Upper certified limit concentration (% w/w)	Preliminary Analysis Mean ± s. d. (5 w/w)
No	Name	Type				
[redacted]						

830.1600. Description of Materials used to produce the product: (MRID No. 467605-01)

The registrant provided the MSDS's for all the starting materials used for the production of the glyphosate acid technical produced in Chinese facility.

Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX
BARCODE:D327137; **Reg. No. :** 73432-R **PRODUCT:** Glyphosate Acid Technical TGAI/MUP

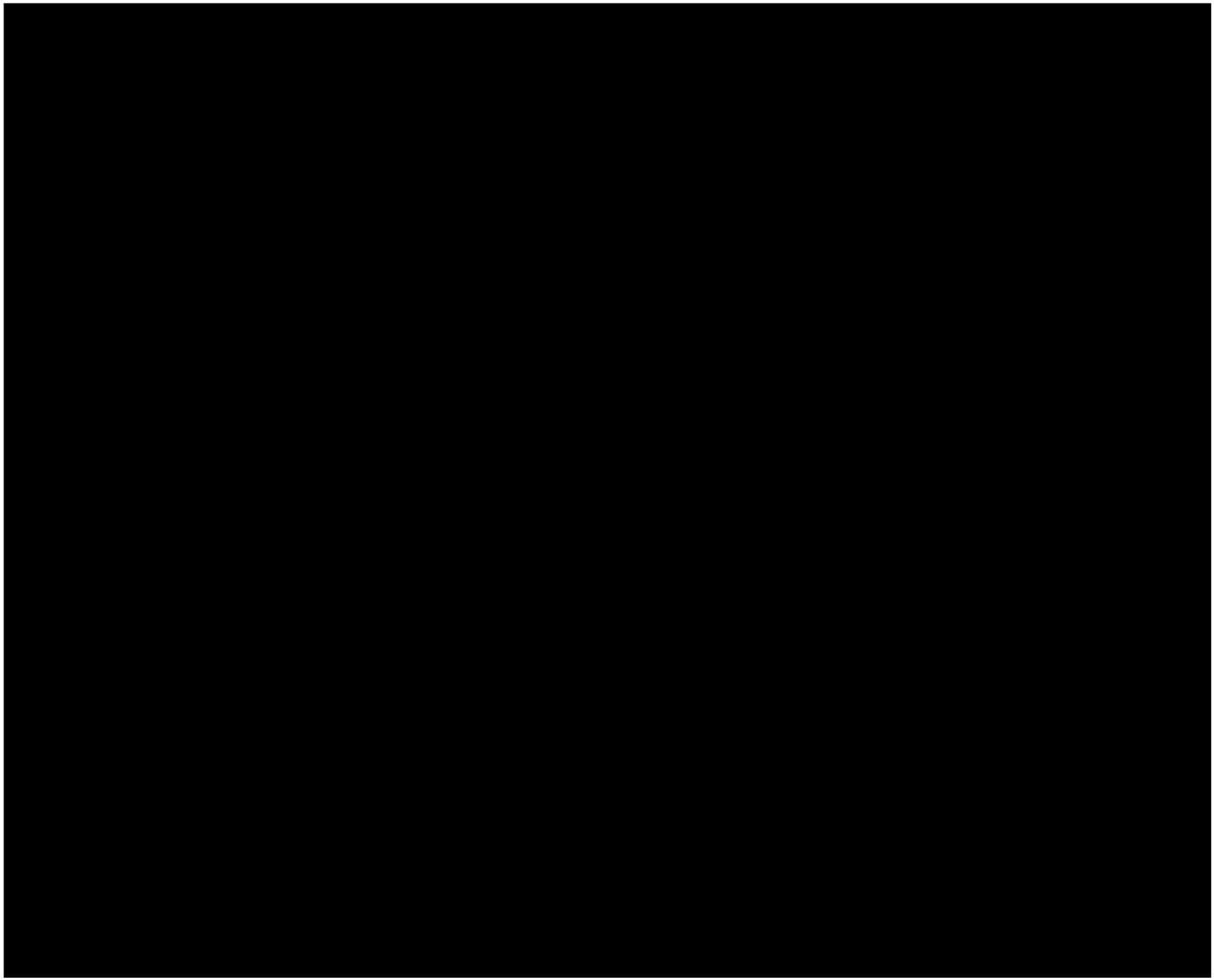
830.1620. Description of production process: (MRID No. 467605-01)

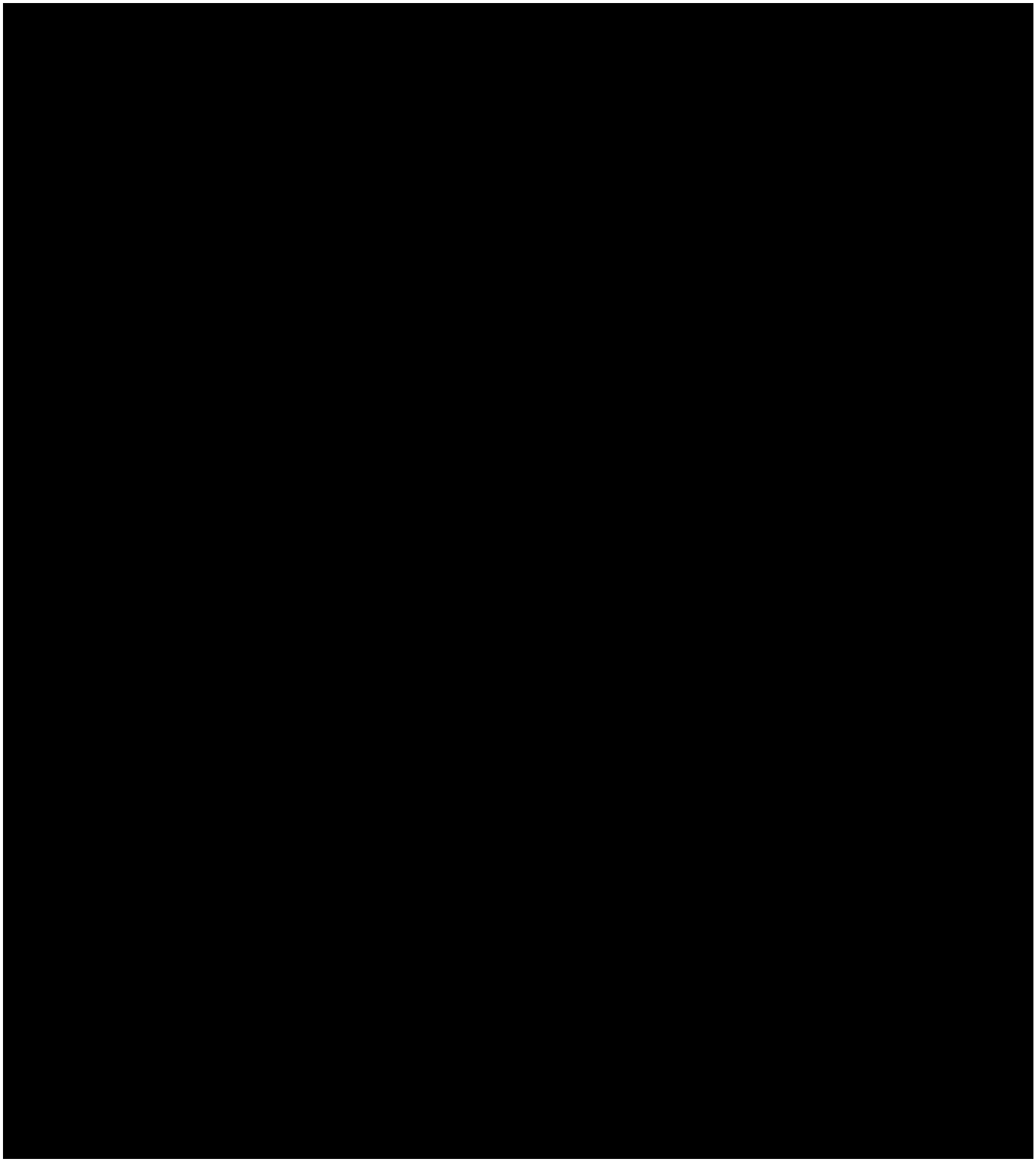
Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX
BARCODE:D327137; **Reg. No. :** 73432-R **PRODUCT:** Glyphosate Acid Technical TGAI/MUP

Manufacturing process information may be entitled to confidential treatment

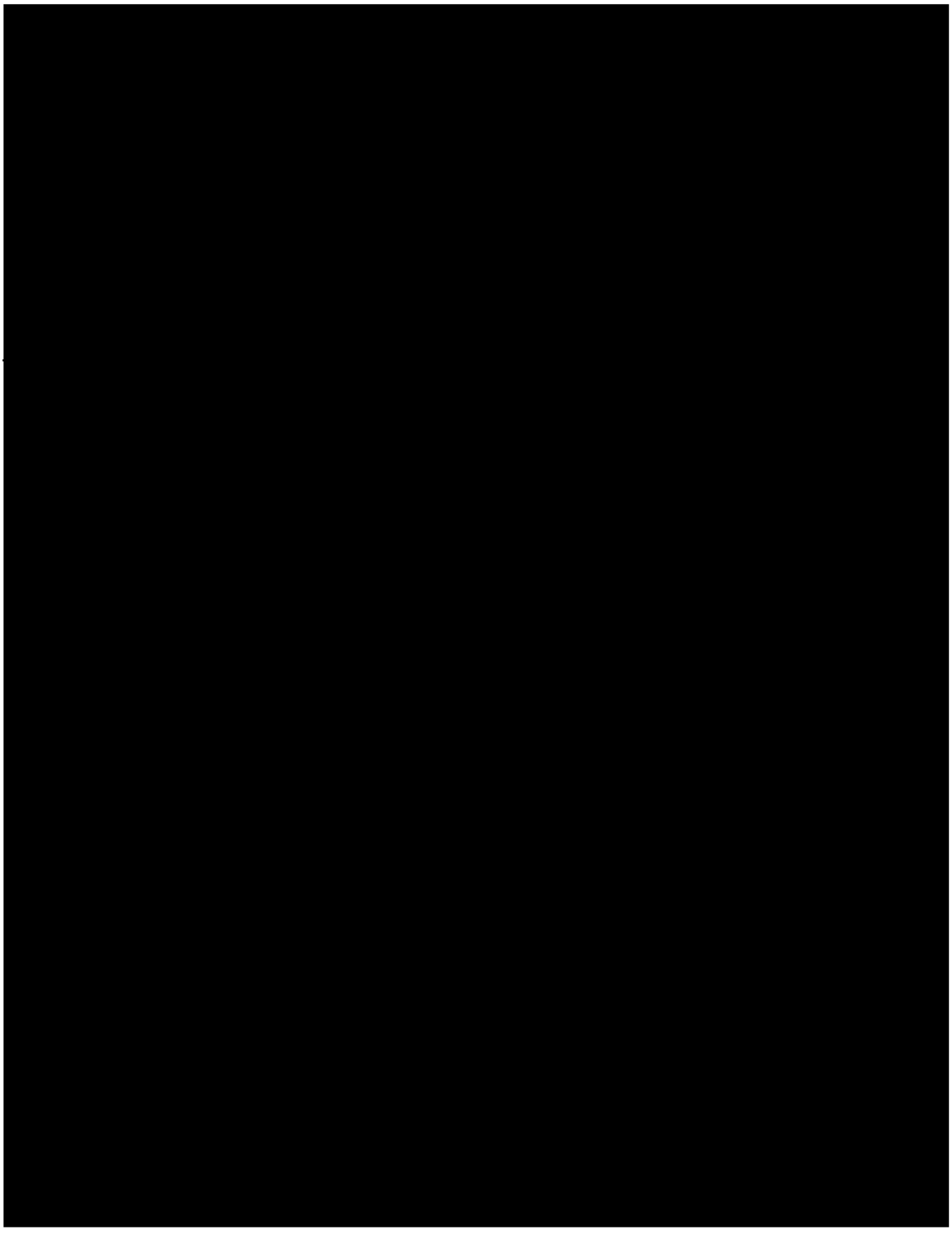
Manufacturing process information may be entitled to confidential treatment



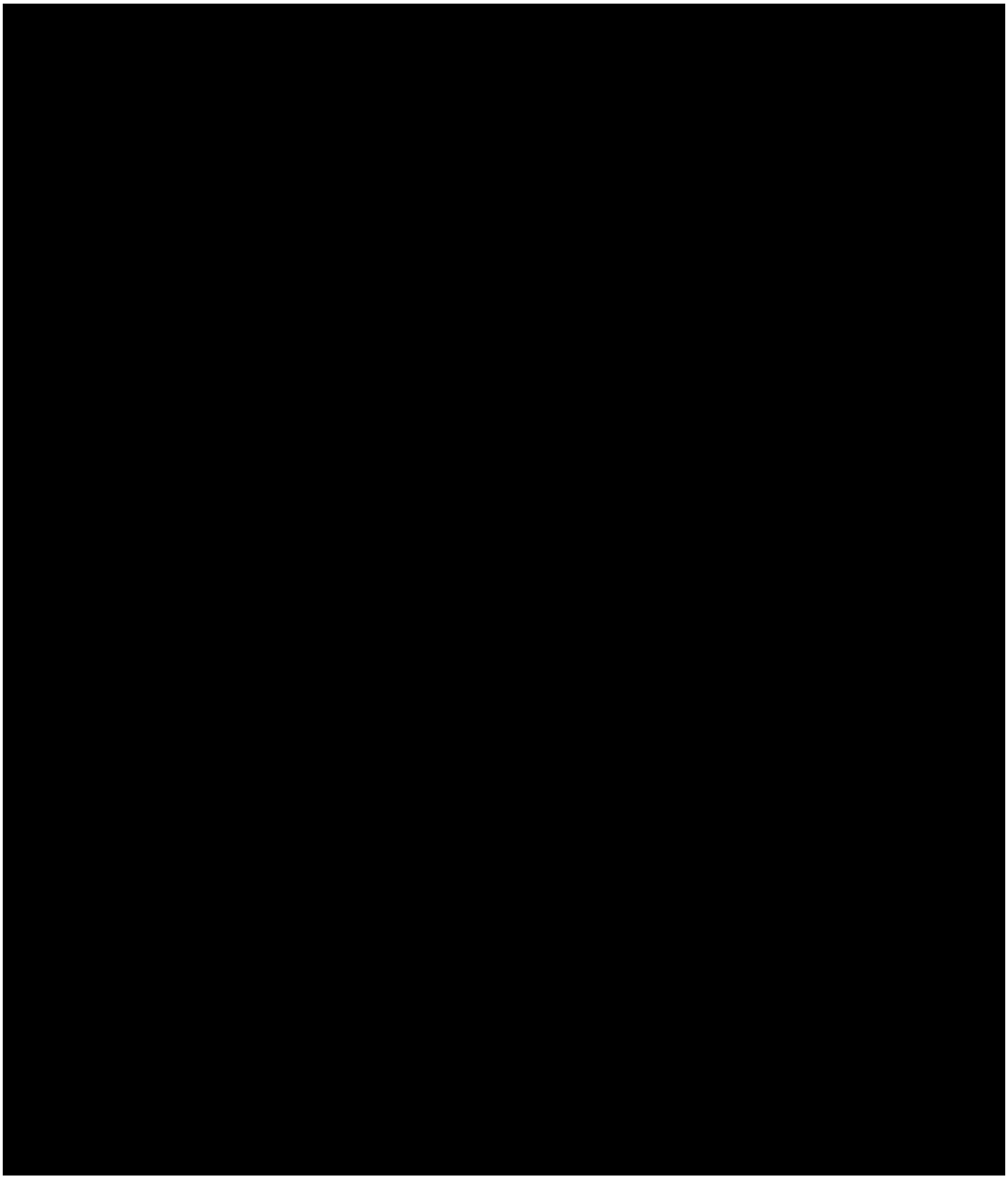


Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX
BARCODE: D327137; **Reg. No. :** 73432-R **PRODUCT:** Glyphosate Acid Technical TGAI/MUP



Manufacturing process information may be entitled to confidential treatment



Manufacturing process information may be entitled to confidential treatment

t3

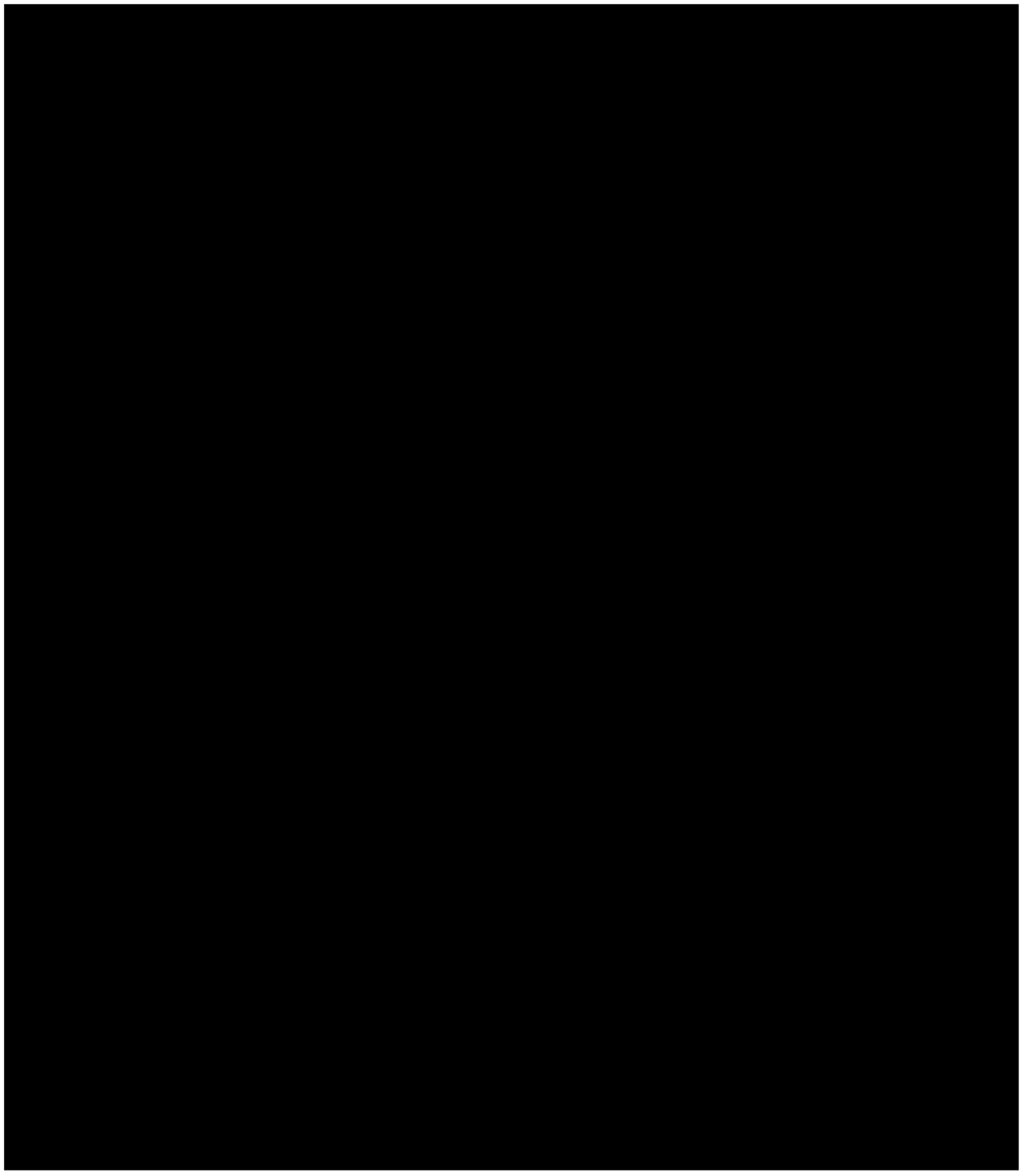
CONFIDENTIAL APPENDIX
BARCODE:D327137; **Reg. No.** : 73432-R **PRODUCT:** Glyphosate Acid Technical TGAI/MUP

830.1670. Discussion on the formation of impurities: (MRID No. 467605-01)

DISCUSSION OF THE FORMATION OF IMPURITIES:

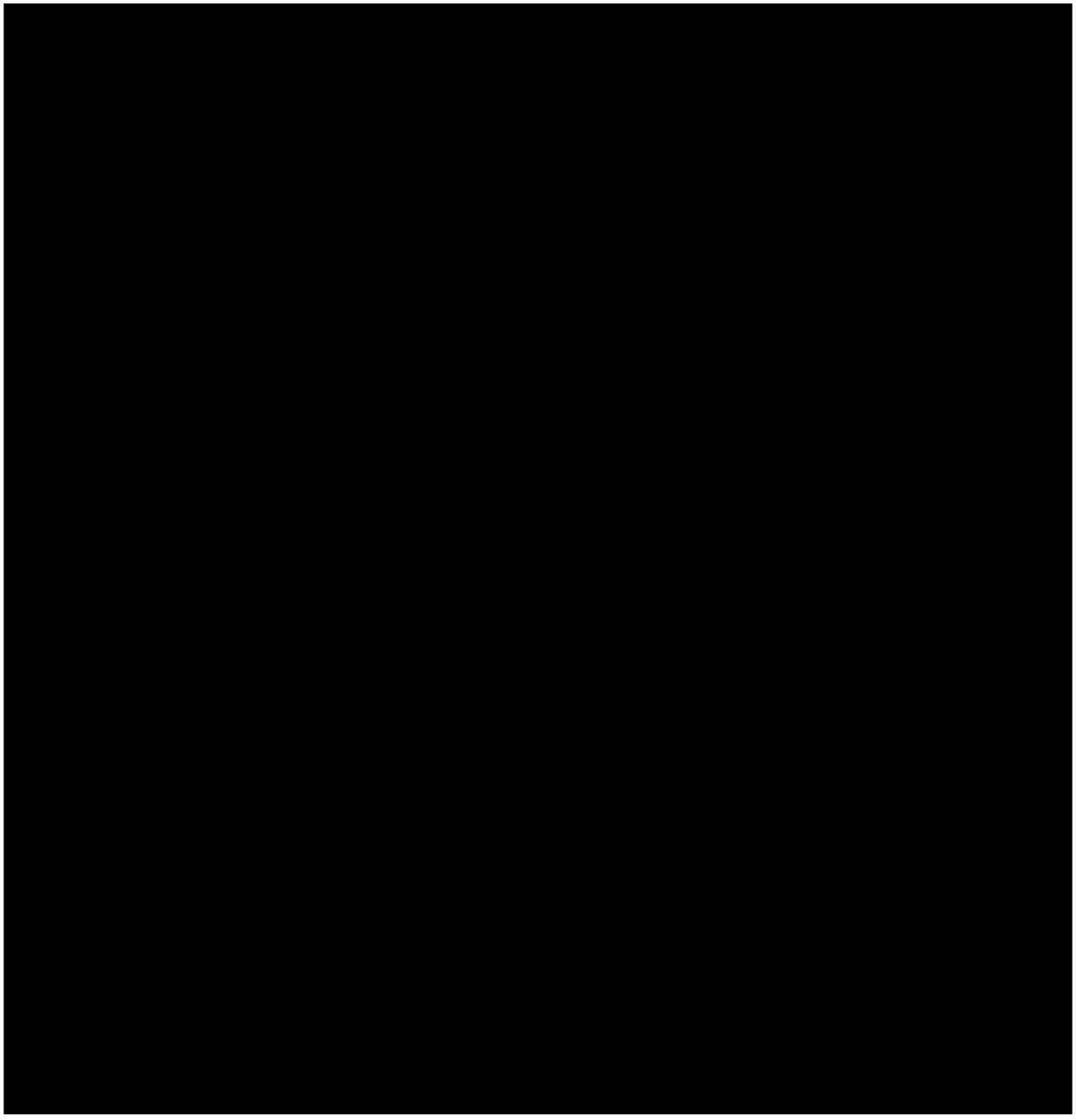
[redacted]

Manufacturing process information may be entitled to confidential treatment



Manufacturing process information may be entitled to confidential treatment

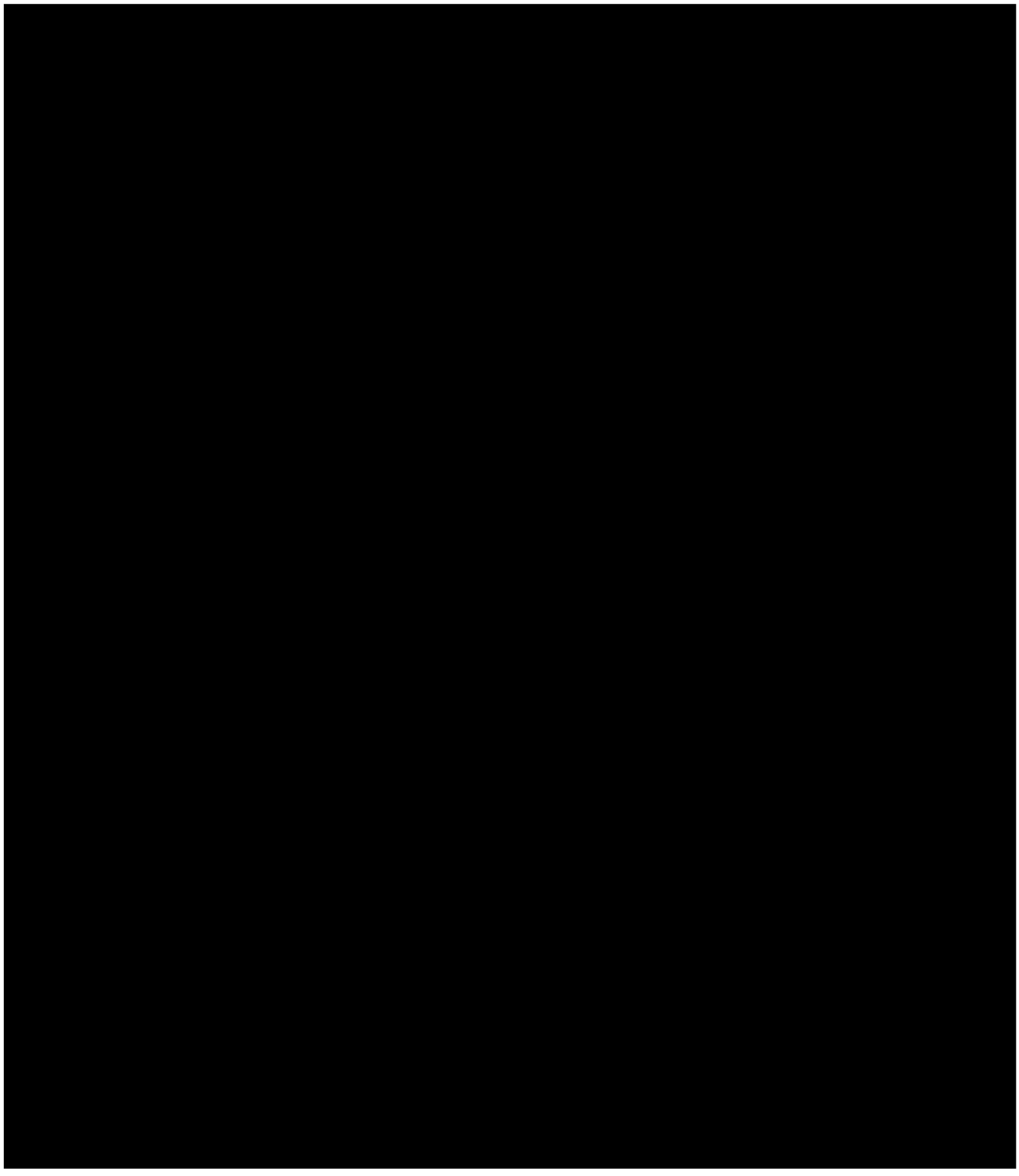
CONFIDENTIAL APPENDIX
BARCODE: D327137; **Reg. No. :** 73432-R **PRODUCT:** Glyphosate Acid Technical TGAI/MUP



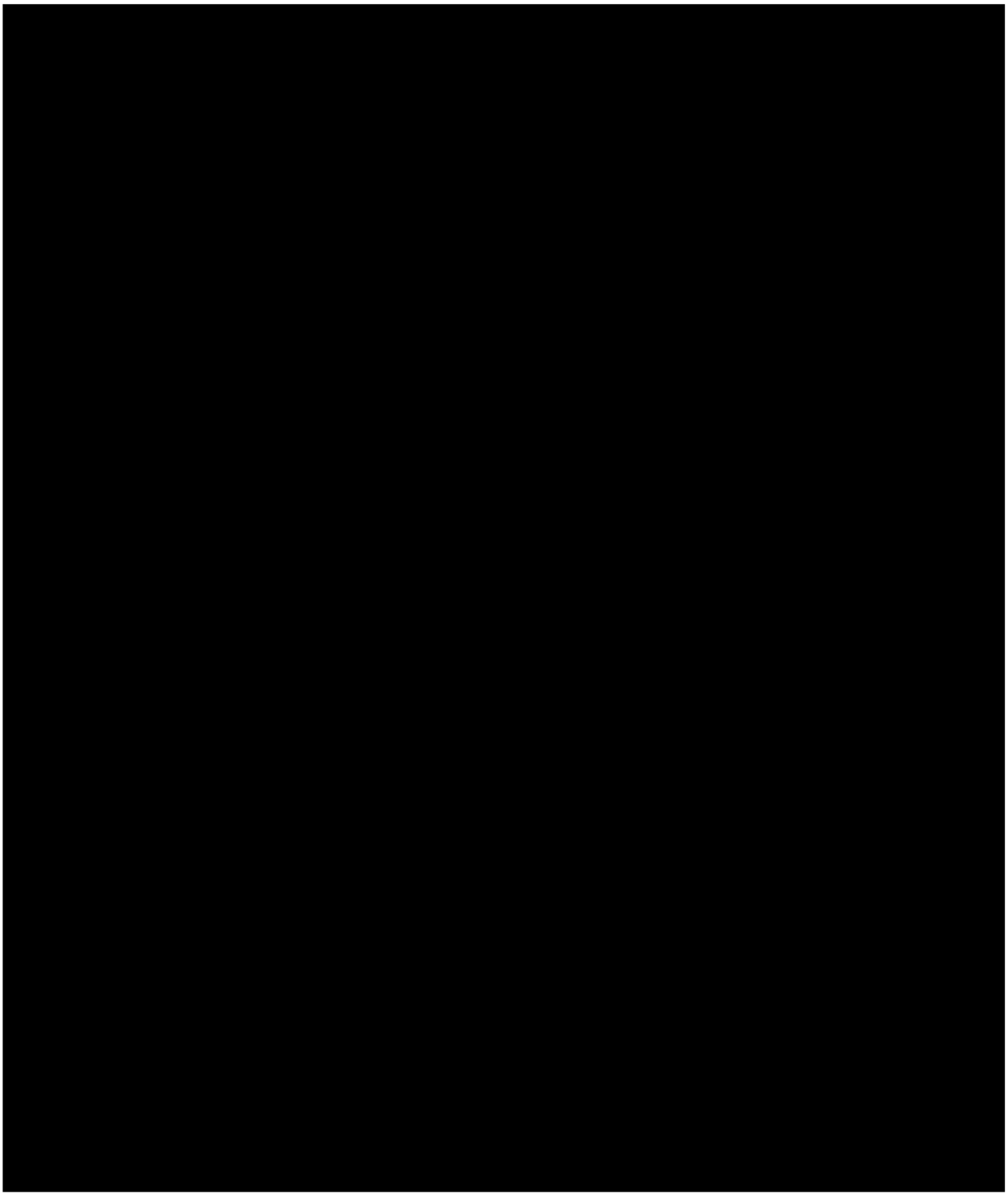
Manufacturing process information may be entitled to confidential treatment

[redacted]

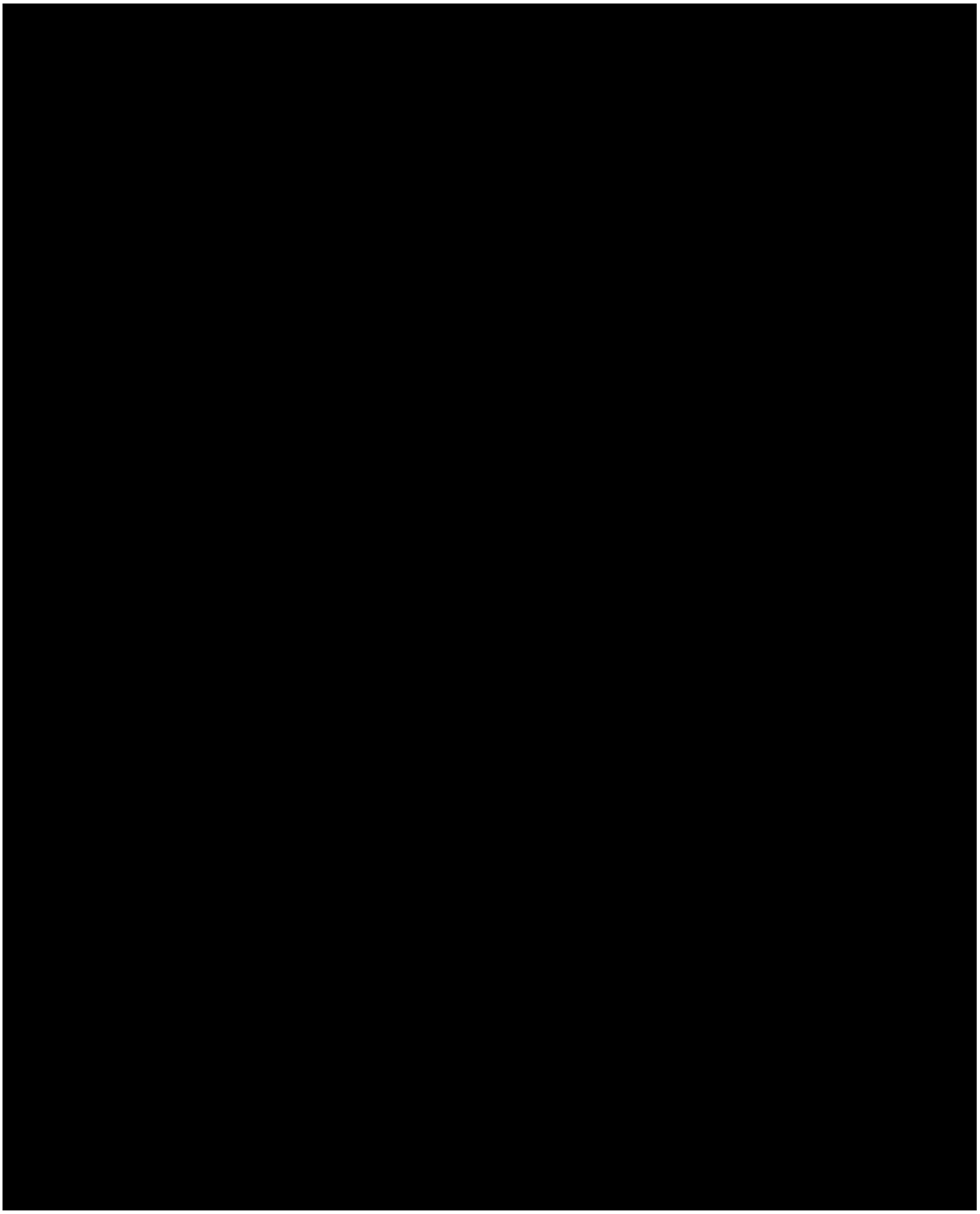
Manufacturing process information may be entitled to confidential treatment



Manufacturing process information may be entitled to confidential treatment



Manufacturing process information may be entitled to confidential treatment



Manufacturing process information may be entitled to confidential treatment

Manufacturing process information may be entitled to confidential treatment

Nufarm Americas, Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Telephone: (630) 455.2000 Facsimile: (630) 455.2001
www.us.nufarm.com

October 10, 2006

Document Processing Desk (**FINLABEL**)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
RoomS-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject: Final Printed Label Glyphosate Acid Technical
EPA Reg. No. 35935-36

Dear Mr. Tompkins:

Enclosed please find one copy of our final printed label in accordance with your letter dated September 26, 2006.

Should you have any questions or the need for additional information please do not hesitate to contact me at 630-455-2000 or via e-mail ted.head@us.nufarm.com.

Best regards,

Theodore D. Head
Product Registration Manager

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 11-30-93

(A) **EPA**

United States Environmental Protection Agency
Office of Pesticide Programs (H7505C)
Washington, DC 20460

Application for Pesticide:

☒ **Registration**
☐ **Amendment**
☐ **Other**

OPP Identifier Number

Please Attach An Original Form

Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
35935- 36	J. Tompkins	☒ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Glyphosate Acid Technical	25	

5. Name and Address of Applicant *(Include ZIP Code)*
Nufarm Limited
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
☐ *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No.

Product Name

Section II

☐ Amendment - Explain Below
☒ Final printed labels in response to Agency letter dated 9-26-06
☐ Resubmission in response to Agency letter dated _
☐ "Me Too" Application
☐ Notification - Explain below
☐ Other - explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II).

Final Printed Label.

Section III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
*Certification must be submitted.	If "Yes," Unit Package Wt. / No. Per Container	If "Yes," Package Wt. / No. Per Container	

3. Location of Net Contents Information	4. Size(s) of Retail Container	5. Location of Label Directions
☒ Label or ☒ Container		☒ On Label or ☒ On Labeling accompanying product

6. Manner In Which Label Is Affixed To Product ☒ Lithograph ☒ Paper Glued ☐ Stenciled ☒ Other (Self-Adhesive Integrated Label/Booklet)

Section IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. *(Include Area Code)*
Theodore D. Head	Product Registration Manager / Agriculture	(708) 754-3330

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	5. Date
[signature]	Product Registration Manager	10-10-06
4. Typed Name Theodore D. Head		

EPA Form 8570-1 (Rev. 12-90) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

EPA Reg. Number:	Date of Issuance:
35935-36	9-26-06
Term of Issuance:	Conditional

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Name of Pesticide Product:
Glyphosate Acid Technical

NOTICE OF PESTICIDE:
_X_ Registration
___ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Nufarm Limited
P.O. Box 13439
Research Triangle Park, NC
27709

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided you agree in writing to:

1. To the Conditions of Sale and Limitations section, change "All such risks shall be…" to "To the extent consistent with applicable law, all such risks shall be…", "Nufarm Limited MAKES NO…" to "To the extent consistent with applicable law, Nufarm Limited MAKES NO…", and "To the extent permitted by law, Nufarm Limited …" to "To the extent consistent with applicable law, Nufarm Limited…".

2. Change the EPA Registration # to 35935-36.

3. Move the sentence "Call a poison control center…" under "If Swallowed" of the "First Aid" section, from the front of the paragraph to the end of the paragraph.

4. Replace "Zhejiang Xinan…" with "Nufarm Limited.".

Reg # 35935-36

Signature of Approving Official:	Date:
James Tompkins, Product Manager (25) Herbicide Branch, Registration Division (7505C)	9-26-06

EPA Form 8570-6

You will submit one copy of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). A stamped copy of labeling is enclosed for your records. If you have any questions please contact Erik Kraft at 703-308-9358.

Sincerely,

James Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

ACCEPTED
with COMMENTS
in EPA Letter Dated
9-26-06
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.
35935-30

GLYPHOSATE ACID TECHNICAL

FOR MANUFACTURING USE ONLY

Active Ingredient:
Glyphosate: N-(phosphonomethyl)glycine.....98.0%
Other Ingredients:.....2.0%
Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If Swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If Inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.	

Manufactured by:
Zhejiang Xinan Chemical Industrial Group Co., Ltd.
No. 93 Baisha Road
Xinanjiang, Jiande Zhejiang Province, 31160
People's Republic of China

EPA Reg. No. 73432-XXX
EPA Est. No. 73432-CHN-001

Net Weight:

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. HARMFUL IF INHALED. Do not get in eyes or on clothing. Avoid breathing dust. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified prior to the discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or the Regional Office of the EPA.

The active ingredient in this product is a non-selective broad spectrum herbicide. Do not handle or use in a manner that can result in accidental contact with desirable vegetation.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

Read entire label before using this product.

For formulation into end-use herbicide products intended for the following uses:

1. **Fallow ground, sod, pastures, rangelands, and noncrop areas including:** aquatic and wetland sites, rights of way, industrial, recreational and public areas, farmsteads, forestry site preparation and release programs, eucalyptus and hybrid poplar production, site preparation or directed sprays to the floor or ornamental nurseries and Christmas tree farms, rights of way (ROW), Conservation Reserve Program (CPR), turgrasses and grasses for seed production.

   Residential Sites

   Row Crops: including corn, cotton, peanuts, sorghum, soybeans, sugarcane, barley, buckwheat, millet, oats, rice, rye, teosinte, triticale, wheat, and wild rice.

   Forage Crops: alfalfa, clover, forage grasses, and forage legumes.

   Tree and Vine Crops: general weed control, middles (between rows of tress), strips (in rows of trees), selective equipment (except kiwi), perennial grass suppression.

   Vine Crops: grapes and kiwi fruit.

   Citrus Fruits: including calamondin, chironja, citron, grapefruit, kumquat, lemon, lime, mandarin orange, orange, pummelo, tangelo, tangerine, and tangors.

Tree Nuts: including almond, beechnut, Brazil nut, butternut, cashew, chestnut, chinquapin, filbert (hazelnut), hickory nut, macadamia nut, pecan, pistachio, and walnut.

Pome Fruits: including apple, crabapple, loquat, mayhaw, pear and quince.

Stone Fruits: including apricots, cherry, nectarine, peach, plum, and prune.

Small Fruits and Berries: including blackberry, blueberry, boysenberry, cranberry, currant, dewberry, elderberry, gooseberry, huckleberry, loganberry, olallieberry, raspberry, and youngberry.

Fruiting Vegetables: including eggplant, groundcherry, pepino, pepper (all), tomatillo and tomato.

Cucurbit Vegetables: including cantaloupe, casaba melon, chayote, Chinese waxgourd, citron melon, cucumber, Crenshaw melon, gherkin, edible gourds, honeydew melon, honey ball melon, mango melon, melons (all), muskmelon, Persian melon, pumpkin, squash, and watermelon.

Root and Tuber Vegetables: including artichoke (Jerusalem), beet greens, beets (garden, sugar), carrots, celeriac, chicory, ginseng, horseradish, oriental radish, parsnips, potatoes, radish, rutabagas, salsify, shallot, sweet potato, turnips, and yams.

Bulb Vegetables: including garlic, leek and onions.

Leafy Vegetables: including amaranth, arrugula, cardoon, celtuce, chervil, chrysanthemum, corn salad, cress, dandelion, dock (sorrel), endive, fennel (Florence), lettuce (head and leaf), parsley, purslane, rape greens, rhubarb, and spinach (all).

Brassica Leafy Vegetables: including broccoli (all), Brussels sprouts, cabbage (all), cabbage (Chinese), cauliflower, cavalo broccoli, celery, celery (Chinese), chard (Swiss), collards, endive, kale, kohlrabi, mizuna, mustard greens, and mustard spinach.

Legume Vegetables: including beans (all), lentils, chickpeas, peas (all), groundcherry, guar, and pepino.

Other Crops: including asparagus, canola, litchi nuts, mint (peppermint, spearmint), olives, okra, sunflower, and watercress.

Tropical Crops: acerola, astemoya, avocado, banana (plantains), breadfruit, canistel, carambola, cherimoya, cocoa beans, coconut, coffee, dates, durian, figs, genip, guava, jaboticaba, jackfruit, longan, lychee, mango, mangosteen, papaya, passion fruit, persimmons, pineapple, pomegranate, rambutan, sapodilla, sapote (black, mamey, white), soursop, sugar apple, tamarind, and tea.

Herbs: peppermint and spearmint

2. Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

3. Uses for experimental purposes that are in compliance with US EPA requirements.

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store in original container only. Do not store near heat or open flame. In case of spill or leak, sweep up and dispose of waste.
PESTICIDE DISPOSAL: Open dumping is prohibited. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Triple rinse (or equivalent). Then off for recycling or dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitations of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of Zhejiang Xinan Chemical Industrial Group Co., Ltd. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Zhejiang Xinan Chemical Industrial Group Co., Ltd. and Seller harmless for any claims relating to such factors.

Zhejiang Xinan Chemical Industrial Group Co., Ltd. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Zhejiang Xinan Chemical Industrial Group Co., Ltd., and Buyer and User assume the risk of any such use. ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO., LTD. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent permitted by law, ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO., LTD. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO., LTD. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING

FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO., LTD. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO., LTD. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitations of Warranty and of Liability, which may not be modified except by written agreement signed by a duly authorized representative of ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO., LTD.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 14, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MR.WILLIAM M. MAHLBURG
NUFARM LIMITED, AGENT FOR
NUFARM LIMITED
PO Box 13439
RTP, NC 27709-

Dear Mr. Mahlburg:

Subject: Transfer of Pesticide Registrations and Data From Company Number 73432 to Company Number 35935

Pursuant to your request in your letter of September 8, 2006 and transfer agreement dated September 7, 2006 and subsequent information received on September 14, 2006, we have approved the transfer of the following registrations and data from **ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO. LTD**, company number 73432 to **NUFARM LIMITED**, company number **35935.**

The effective date of these changes is the date of this letter.

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
GLYPHOSATE ACID TECHNICAL	73432-1	35935-36

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into

distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to initiation. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated September 8, 2006 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **NUFARM LIMITED** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Kathleen O'Malley at (703) 305-5411.

Sincerely,

Kathryn S. Bouvé

Kathryn S. Bouvé, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: LAWRENCE A. MILLER
BIOLOGIC, INC., AGENT FOR
ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO. LTD
115 OBTUSE HILL
BROOKFIELD, CT 06804-

Nufarm Americas, Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Telephone: (630) 455.2000 Facsimile: (630) 455.2001
www.us.nufarm.com

September 14, 2006

Document Processing Desk **(XFER)**
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
RoomS-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention: Eric Kraft
Herbicide Branch

Subject: Data Matrix and 8570-34 for EPA File Symbol 73432-R

Dear Eric:

Enclosed is the data matrix and EPA Form 8570-34 as requested for EPA file symbol 73432-R. We have chosen the selective method of data support and I am providing a **Letter of Authorization From Monsanto** confirming Nufarm's rights to access Glyphosate Registration Data.

Should you have any questions or the need for additional information please do not hesitate to contact me at 630-455-2000 or via e-mail ted.head@us.nufarm.com.

Best regards,

Theodore D. Head
Product Registration Manager

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date September 14, 2006	EPA Reg. No./File Symbol 35935-[Pending]	Page 1 of 3
Applicant's/Registrant's Name & Address Nufarm Limited. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product Glyphosate Technical	

Ingredient: Glyphosate, N-(phosphonomethyl) glycine

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	Product Properties				
830.1550	Product identity and composition	46760501	Nufarm Limited	OWN	
830.1600	Description of materials used to produce the product	46760501	Nufarm Limited	OWN	
830.1620	Description of production process	48760501	Nufarm Limited	OWN	
830.1670	Discussion of formation of impurities	46760501	Nufarm Limited	OWN	
830.t700	Preliminary analysis	46760502	Nufarm Limited	OWN	
830.t750	Certified limits	46760502	Nufarm Limited	OWN	
830.1800	Enforcement analytical method	46780502	Nufarm Limited	OWN	
830.6302	Color	46760503	Nufarm Limited	OWN	
830.6303	Physical state	46760503	Nufarm Limited	OWN	
830.6304	Odor	48760503	Nufarm Limited	OWN	

Signature	Name and Title	Date
Theodore D. Head	Theodore D. Head Product Registration Manager	9-14-06

Form Approved OMB No. 2070-0060

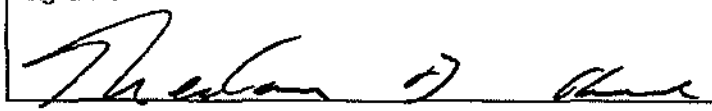
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date September 14, 2006	EPA Reg. No./File Symbol 35935-[Pending]	Page 1 of 3
Applicant's/Registrant's Name & Address Nufarm Limited. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product Glyphosate Technical	

Ingredient: Glyphosate, N-(phosphonomethyl) glycine

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	Product Properties				
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	

Signature	Name and Title	Date
	Theodore D. Head Product Registration Manager	9-14-06

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date September 14, 2006	EPA Reg. No./File Symbol 35935-[Pending[	Page 2 of 3
Applicant's/Registrant's Name & Address Nufarm Limited 150 Harvester Drive, Suite 200 Burr Ridge, IL 80527	Product Glyphosate Technical	

Ingredient: Glyphosate, N-(phosphonomethyl) glycine

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	Product Properties (continued)				
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	46760504	Nufarm Limited	OWN	
830.6314	Oxidation/reduction: chemical incompatibility	46760504	Nufarm Limited	OWN	
830.7000	pH	46760503	Nufarm Limited	OWN	
830.7050	UV/Visible absorption	48760503	Nufarm Limited	OWN	
830.7200	Melting point/melting range	46760503	Nufarm Limited	OWN	
830.7370	Dissociation constants in water	46760503	Nufarm Limited	OWN	
830.7570	Partition coefficient (n-octanol/water), shake flask method	46760503	Nufarm Limited	OWN	
830.7860	Water solubility: column elution method; shake flask method	46760503	Nufarm Limited	OWN	
830.7950	Vapor pressure	46760503	Nufarm Limited	OWN	

Signature	Name and Title	Date
	Theodore D. Head Product Registration Manager	9-14-06

Form Approved OMB No. 2070-0060

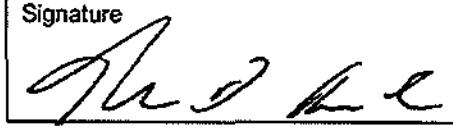
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date September 14, 2006	EPA Reg. No./File Symbol 35935-[Pending]	Page 2 of 3
Applicant's/Registrant's Name & Address Nufarm Limited 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product Glyphosate Technical	

Ingredient: Glyphosate, N-(phosphonomethyl) glycine

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	Product Properties (continued)				
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	
				OWN	

Signature	Name and Title	Date
	Theodore D. Head Product Registration Manager	9-14-06

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date September 14, 2006	EPA Reg. No./File Symbol 35935-[Pending]	Page 3 of 3
Applicant's/Registrant's Name & Address Nufarm Limited 150 Harvester Drive, Suite 200 Burr Ridge, Il. 60527	Product Glyphosate Technical	

Ingredient: Glyphosate, N-(phosphonomethyl) glycine

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
40 CFR 158.340	Toxicology				
81-1	Acute oral toxicity - rat	46760505	Nufarm Limited	Own	
81-2	Acute dermal toxicity - rat	46760506	Nufarm Limited	Own	
81-3	Acute inhalation toxicity - rat	46760507	Nufarm Limited	Own	
81-4	Primary eye irritation - rabbit	46760508	Nufarm Limited	Own	
81-5	Primary skin irritation -rabbit	46760509	Nufarm Limited	Own	
81-6	Dermal sensitization - Guinea pig	46760510	Nufarm Limited	Own	
OPPTS Series 830	Product Properties				
830.1700	Preliminary analysis	46913201	Nufarm Limited	OWN	
830.1750	Certified limits	46913201	Nufarm Limited	OWN	
830.1800	Enforcement analytical method	46913201	Nufarm Limited	OWN	
(Letter of Authorization From Monsanto confirming Nufarm's rights to access Glyphosate Registration Data attached)					

Signature	Name and Title	Date
Theodore D. Head	Theodore D. Head Product Registration Manager	9-14-06

Form Approved OMB No. 2070-0060

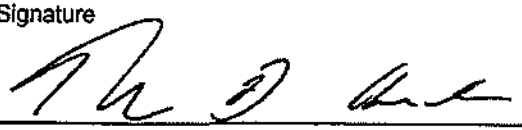
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date September 14, 2006	EPA Reg. No./File Symbol 35935-[Pending]	Page 3 of 3
Applicant's/Registrant's Name & Address Nufarm Limited 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product Glyphosate Technical	

Ingredient: Glyphosate, N-(phosphonomethyl) glycine

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				Own	
				Own	
				Own	
				Own	
				Own	
				Own	
				OWN	
				OWN	
				OWN	

Signature	Name and Title	Date
	Theodore D. Head Product Registration Manager	9-14-06

MONSANTO

MONSANTO COMPANY
1300 I (EYE) STREET, NW
SUITE 450 EAST
WASHINGTON, D.C. 20005
PHONE (202) 383-2866
FAX (202) 789-1748
http://www.monsanto.com

April 12, 2005

Document Processing Center
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 South Bell Street
Arlington, VA 22202-4501

Attention: Mr. James A. Tompkins
Team Leader (25)

Subject: Reconfirming Nufarm Inc. Rights to Access certain Monsanto Glyphosate Registration Data.

Dear Mr. Tompkins:

Nufarm Inc. and its Affiliates (together, Nufarm) are hereby authorized to reference, in perpetuity, Monsanto's registration data for glyphosate submitted on or before July 1998, subject to the following limitations:

a) This authorization includes all glyphosate data (except formulation specific data) for:
   All conventional crop uses
   All non-crop uses, excluding Lawn and Garden (residential) uses

b) This authorization includes all metabolism and residue data pertaining to:
   Roundup Ready cotton uses
   Roundup Ready corn uses
   Roundup Ready soybeans uses

c) This authorization excludes any metabolism and residue data pertaining to glyphosate tolerant crops other than those referenced above; and

d) This authorization excludes any data pertaining to other registered uses approved since July, 1998 not specifically referenced above.

Nufarm is also authorized to reference any additional post-July 1998 data Monsanto has submitted or submits to maintain the above included uses.

Nufarm is further authorized to reference product specific data (product chemistry, acute toxicity, and efficacy) pertaining to:

Roundup Original Herbicide	EPA Reg. No. 524-445
Roundup Original RT Herbicide	EPA Reg. No. 524-454
Accord Herbicide	EPA Reg. No. 524-326
Rodeo Emerged Aquatic Weed and Brush Herbicide	EPA Reg. No. 524-343
Roundup D-Pak Herbicide	EPA Reg. No. 524-494
Glyphosate Technical Herbicide	EPA Reg. No. 524-421
Glyphosate Herbicide	EPA Reg. No. 424-420
MON 0139 62% Technical Solution	EPA Reg. No. 524-333
MON 8750	EPA Reg. No. 524-427
Glyphosate, Sesquisodium Salt	EPA Chemical Code 103603
Polado Plant Growth Regulator	EPA Reg. No. 524-332 (cancelled)

This authorization extends, subject to the above defined scope, to new applications for registrations and any subsequent applications for amended registrations as well as state registrations of products supported by the data listed above.

The US Environmental Protection Agency and relevant sub-national agencies are hereby authorized to consider and reference the data listed above in support of Nufarm's registrations.

This letter does not authorize Nufarm to extend such referencing rights to any third parties other than sub registrants of their specific products that are supported by these data. All data which is authorized to be referenced hereunder shall remain the property of Monsanto and such data shall not be copied by Nufarm or transferred to Nufarm except in compliance with Section 10 of the Federal Insecticide, Fungicide and Rodenticide Act, As Amended, and procedures established thereunder.

Current EPA Company Numbers for Nufarm and its Affiliates are:

228	33688	67591
71368	35935	70596
55146	48273	71478
11685	61272	64004

If you have any questions on this matter please feel free to contact me through Dr. Russell P. Schneider (202-383-2866) or by direct phone (314-694-1582), fax (314-694-4028), or electronic mail at stephen.j.wratten@monsanto.com.

Sincerely,

Stephen J. Wratten
Manager, Registrations

cc: R. P. Schneider
L. Evetts
Nufarm, Inc.

Nufarm Data Access.doc

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number	EPA Registration Number/File Symbol
Nufarm Limited 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527 Telephone (630) 455-2000	35935 –[pending]
Active Ingredient(s) and/or representative test compound(s) Glyphosate, N-(phosphonomethyl) glycine	Date See Section III
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 Appendix A) Terrestrial food crop, terrestrial nonfood crop, forestry, aquatic noncrop, domestic outdoor.	Product Name Glyphosate Technical

NOTE: If your product is a 100% repackaging of another EPA-registered product labeled for the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose.)

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements).

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data Call-In response is supported by all data submitted or cited in the application for registration, the form for registration, or the Data Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements that I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
[signature]	9-14-06	Theodore D. Head Product Registration Manager

EPA Form 8570-34 (Rev. 9-97) Electronic and Paper versions available. Submit only Paper version.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☑ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
73432-RRR R	J. Tompkins	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Glyphosate Acid Technical	25	

5. Name and Address of Applicant *(Include ZIP Code)*

Zhejiang Xinan Chemical Industrial Group Co., Ltd.
c/o BIOLOGIC, Inc.
115 Obtuse Hill Road Brookfield, CT 06804

☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(ii(, my product is similar or identical in composition and labeling to:
EPA Reg. No. 524-420
Product Name Glyphosate

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Finel printed labels in repsonse to Agency letter deted _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional pegels) if necessary. (For section I and Section II.(

This application for a new pesticide product will fall within the category on Table 4 - Registration Division: New Products as published in the June 2, 2005 Federal Register. This product is further defined under EPA No. R3t; CR No. 86 as a "New Product", "Non-Fast Track." Zhejiang Xinan is submitting product chemistry and acute toxicity data and is using the cite-all method for any additional data that may be applicable to this registration action. The PRIA fee for this application is $4,200.

.e Miller Tel: 203-740-t200; Fax: 203-740-1220; Email: jmiller@biologicconsultino.com

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Wetor Soluble Peckaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yos ☑ No	☐ Metel ☐ Plastic ☐ Glass ☐ Peper ☑ Other (Specify) Fibre drum
rtification must be submitted	If "Yes" Unit Packoging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Reteil Container	5. Location of Label Direcuons
☑ Label ☑ Container	25 kg.	☑

6. Manner in Which Label is Affixed to Product ☑ Lithograph, Paper glued, Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individuel to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Lawrence A. Miller	Agent for Zhejiang Xinan Chem. Ind. Group	203-740-1200

Certification

I certify that the statements I hove made on this form and all ettechments thereto ore true, occurete and complete. I acknowledge that any knowlingtly felse or misleading statement may be punishable by fine or imprisonment or both under applicable law.

ınature	3. Titlo	6. Date Application Received (Stamped)
	Agent for Zhejiang Xinan Chem. Ind. Group	
4. Typed Name: Lawrence A. Miller	5. Dato: January 25, 2006	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

20/APR/2006

MEMORANDUM

Subject:	Name of Pesticide Product:	Glyphosate Acid Technical
	EPA Reg. No. /File Symbol:	73432-R
	DP Barcode:	D327140
	Decision No.:	364894
	PC Code:	417300

From: Eugenia Mc Andrew, Biologist E McAndrew
Technical Review Branch
Registration Division (7505C)

To: Erik Kraft, RM Team 25
Herbicide Branch
Registration Division (7505C)

Applicant: Zhejiang Xinan Chemical Industrial Group Co., Inc.
c/o Biologic, Inc.
115 Obtuse Hill Road
Brookfield, CT 06804

FORMULATION FROM LABEL:

Active Ingredient(s):		% by wt.
417300	Glyphosate: N-(phosphonomethyl) glycine	98.0
Inert Ingredient(s):		2.0
	Total:	100.0%

ACTION REQUESTED: The Risk Manager requests review of acute toxicity data for Glyphosate Acid Technical, EPA File Symbol 73432-R.

BACKGROUND: Zhejiang Xinan Chemical Industrial Group Co., Inc. has submitted a six pack of acute toxicity studies to support registration of the proposed product, Glyphosate Acid Technical, EPA File Symbol 73432-R. The studies were conducted at Product Safety Laboratories, Dayton, New Jersey with assigned MRID numbers 467605-05 to -10. A CSF for a basic formulation dated January 25, 2006 is included in the submission.

RECOMMENDATIONS: The six studies have been reviewed and are classified as acceptable. They do support registration of the proposed product.

The acute toxicity profile for Glyphosate Acid Technical, EPA File Symbol 73432-R, is as follows:

Acute oral toxicity	IV	Acceptable	MRID 46760505
Acute dermal toxicity	IV	Acceptable	MRID 46760506
Acute inhalation toxicity	IV	Acceptable	MRID 46760507
Primary eye irritation	II	Acceptable	MRID 46760508
Primary skin irritation	IV	Acceptable	MRID 46760509
Dermal sensitization	Neg.	Acceptable	MRID 46760510

Note: The percentage of ingredients on the CSF totals 99.2%. In the certificate of analysis provided in the studies, the ingredients total 100% with all manufacturing impurities listed. These impurities must also be shown on the CSF to total 100%.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: 073432-00001

PRODUCT NAME: Glyphosate Acid Technical

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:

SIGNAL WORD: WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

First Aid:

If in eyes:
-Hold eye open and rinse slowly and gently with water for 15-20 minutes.
-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
-Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Reviewer: Eugenia McAndrew **Date:** April 20, 2006
Risk Manager: 25

STUDY TYPE: Acute Oral Toxicity - Rat; OPPTS 870.1100; OECD 425

TEST MATERIAL: Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder)

CITATION: Merkel, D. Glyphosate Acid Technical. Acute Oral Toxicity Study Up and Down Procedure in Rats. Product Safety Laboratories, Dayton, New Jersey. Laboratory Study Number 15274. April 4, 2005. MRID 46760505 Unpublished.

SPONSOR: Zhejiang Xinan Chemical Industrial Group Co., Inc., No. 93 Baisha Road, Jiande, Zhejiang Province, 31160, People's Republic of China

EXECUTIVE SUMMARY: In an acute oral toxicity study (MRID 46760505), three female Sprague-Dawley derived young adult albino rats (Age: 11 weeks; Source: Ace Animals, Inc., Boyertown, PA; 222-235 g) were given a single oral dose of Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder) using the Up and Down Procedure. "The sample was administered as a 50% w/w suspension in distilled water. Preliminary solubility testing conducted by PSL indicated suspensions in excess of 50 % (i.e., 60-80%) were too viscous to be administered properly." A limit dose of 5000 mg/kg of the test substance was administered to one healthy female rat by oral gavage. This animal survived so two additional females received the same dose level. Animals were then observed for 14 days.

Oral LD_{50} Females > 5000 mg/kg bw

All animals survived and gained weight. Clinical signs noted included diarrhea, ano-genital staining, facial staining and reduced fecal volume. The animals recovered from these symptoms by day 4. No gross abnormalities were noted at necropsy.

Toxicity based on the lack of deaths at the limit dose. EPA Toxicity Category IV.

This acute oral study is classified as Acceptable. It does satisfy the guideline requirement for an acute oral study (OPPTS 870.1100; OECD 425) in the rat.

COMPLIANCE: Signed and dated GLP, Quality Assurance, and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Individual animals were dosed as follows:

Dosing Sequence	Animal No.	Dose level (mg/kg)	Short Term Outcome	14 Day Outcome
1	4765	5000	S	S
2	4856	5000	S	S
3	4857	5000	S	S

S = survival D = death

A. Mortality - None

B. Clinical observations - All animals survived and gained weight. Clinical signs noted included diarrhea, ano-genital staining, facial staining and reduced fecal volume. The animals recovered from these symptoms by day 4.

C. Gross Necropsy - No gross abnormalities were noted.

D. Reviewer's Conclusions: We agree with the study author that the acute oral LD_{50} of Glyphosate Acid Technical is greater than 5000 mg/kg of body weight in female rats

Reviewer: Eugenia McAndrew **Date:** April 20, 2006
Risk Manager: 25

STUDY TYPE: Acute Dermal Toxicity - Rat; OPPTS 870.1200; OECD 402

TEST MATERIAL: Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder)

CITATION: Merkel, D. Glyphosate Acid Technical. Acute Dermal Toxicity Study in Rats - Limit Test. Product Safety Laboratories, Dayton, New Jersey. Laboratory Study Number 15275. April 4, 2005. MRID 46760506 Unpublished.

SPONSOR: Zhejiang Xinan Chemical Industrial Group Co., Inc., No. 93 Baisha Road, Jiande, Zhejiang Province, 31160, People's Republic of China

EXECUTIVE SUMMARY: In an acute dermal toxicity study (MRID 46760506), 5/sex of Sprague-Dawley derived young adult albino rats (Age: 8 weeks; Source: Ace Animals, Inc., Boyertown, PA; 231-264 g males and 193-200 g females) were dermally exposed to Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder). In order to insure adequate contact with the skin, the sample was applied as a dry paste (70% w/w mixture in distilled water). Five thousand mg/kg bw of the test substance was applied to a 2 inch x 3 gauze pad and placed on a dose area of approximately 2 inches by 3 inches (approximately 10% of the body surface). Test sites were wrapped with tape for a 24 hour period. After 24 hours the pads were removed. Animals were then observed for 14 days.

Dermal LD_{50} Males > 5000 mg/kg bw
Dermal LD_{50} Females > 5000 mg/kg bw
Dermal LD_{50} Combined > 5000 mg/kg bw

All animals survived and gained weight. "There were no signs of gross toxicity, dermal irritation, adverse pharmacologic effects or abnormal behavior." No gross abnormalities were noted at necropsy.

Toxicity based on the lack of deaths at the limit dose. EPA Toxicity Category IV.

This acute dermal study is classified Acceptable. It does satisfy the guideline requirement for an acute dermal study (OPPTS 870.1200; OECD 402) in the rat.

COMPLIANCE: Signed and dated GLP, Quality Assurance, and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Dose (mg/kg bw)	Mortality/Number Tested		
	Males	Females	Combined
5000	0/5	0/5	0/10

A. Mortality - None

B. Clinical observations - All animals survived and gained weight. "There were no signs of gross toxicity, dermal irritation, adverse pharmacologic effects or abnormal behavior."

C. Gross Necropsy - No gross abnormalities were noted.

D. Reviewer's Conclusions: We agree with the study author that the acute dermal LD_{50} of Glyphosate Acid Technical is greater than 5000 mg/kg bw in male and female rats.

Reviewer: Eugenia McAndrew **Date:** April 20, 2006
Risk Manager: 25

STUDY TYPE: Acute Inhalation Toxicity - Rat; OPPTS 870.1300; OECD 403

TEST MATERIAL: Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder)

CITATION: Merkel, D. Glyphosate Acid Technical. Acute InhalationToxicity Study in Rats - Limit Test. Product Safety Laboratories, Dayton, New Jersey. Laboratory Study Number 15276. April 4, 2005. MRID 46760507 Unpublished.

SPONSOR: Zhejiang Xinan Chemical Industrial Group Co., Inc., No. 93 Baisha Road, Jiande, Zhejiang Province, 31160, People's Republic of China

EXECUTIVE SUMMARY: In an acute inhalation toxicity study (MRID 46760507), 5/sex of young adult Sprague-Dawley rats (Age: 9-10 weeks; Source: Ace Animals, Inc., Boyertown, PA; 280-318 g males and 205-224 g females) were exposed nose only via the inhalation route to ground Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder) for 4 hours at a concentration of 2.04 mg/L. Animals were then observed for 14 days.

LC_{50} Males > 2.04 mg/L
LC_{50} Females > 2.04 mg/L
LC_{50} Combined > 2.04 mg/L

All animals survived and gained weight. "There were no signs of gross toxicity, dermal irritation, adverse pharmacologic effects or abnormal behavior." No gross abnormalities were noted at necropsy. The gravimetric chamber concentration was 2.04 mg/L and the mass median aerodynamic diameter was estimated to be 2.5 μm with a geometric standard deviation of 2.04.

Toxicity is based on lack of deaths at the limit dose. EPA Toxicity Category IV.

This acute inhalation study is classified as Acceptable. It does satisfy the guideline requirement for an acute inhalation study (OPPTS 870.1300; OECD 403) in the rat.

COMPLIANCE: Signed and dated GLP, Quality Assurance, and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Nominal Conc. (mg/L)	Gravimetric Conc. (mg/L)	MMAD μm	GSD μm	Mortality/Number Tested		
				Males	Females	Combined
8.99	2.04	2.5	2.04	0/5	0/5	0/10

Test Atmosphere / Chamber Description:

Chamber Volume:	6.7 L
Airflow:	31.6 LPM
Temperature:	20-21°C
Relative Humidity:	55-66%
Time to Equilibrium:	1.0 min.

Test atmosphere concentration - Gravimetric samples were withdrawn at 6 intervals from the breathing zone of the animals. Filter papers were weighed before and after collection to determine the chamber concentration. This value was divided by the total volume of air sampled to determine the chamber concentration.

Particle size determination - Particle size was determined twice during the exposure. The MMAD and geometric standard deviation were determined graphically using the two-cycle logarithmic probit axes.

A. Mortality - None

B. Clinical observations - All animals survived and gained weight. "There were no signs of gross toxicity, dermal irritation, adverse pharmacologic effects or abnormal behavior."

C. Gross Necropsy - No gross abnormalities were noted.

D. Reviewer's Conclusions: We agree with the study author that the acute inhalation LC_{50} of Glyphosate Acid Technical is greater than 2.04 mg/L in male and female rats.

Reviewer: Eugenia McAndrew **Date:** April 20, 2006
Risk Manager: 25

STUDY TYPE: Primary Eye Irritation - Rabbit; OPPTS 870.2400; OECD 405

TEST MATERIAL: Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder)

CITATION: Merkel, D. Glyphosate Acid Technical. Primary Eye Irritation Study in Rabbits. Product Safety Laboratories, Dayton, New Jersey. Laboratory Study Number 15277. April 4, 2005. MRID 46760508 Unpublished.

SPONSOR: Zhejiang Xinan Chemical Industrial Group Co., Inc., No. 93 Baisha Road, Jiande, Zhejiang Province, 31160, People's Republic of China

EXECUTIVE SUMMARY: In a primary eye irritation study (MRID 46760508), 0.1 mL (0.06 grams) of ground Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder) was instilled into the conjunctival sac of the right eye of three young adult New Zealand albino male rabbits (Source: Robinson Services, Inc., Clemmons, NC). The left eye served as the control. Animals were then observed at 1, 24, 48, and 72 hours and at 4, 7 and 10 days post-instillation. Irritation was scored by the method of Draize.

From one hour through 48 hours, corneal opacity, iritis and conjunctivitis were noted in all three eyes. The corneal opacity and conjunctivitis persisted through day 7 resolving by day 10. The iritis resolved by day 7. All eyes were free of irritation by day 10.

In this study, formulation is severely irritating to the eye. EPA Toxicity Category II.

This study is classified as Acceptable. It does satisfy the guideline requirement for a primary eye irritation study (OPPTS 870.2400; OECD 405) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance, and Data Confidentiality statements were provided.

RESULTS AND DISCUSSION:

	Number "positive"/number tested						
	Hours				Days		
Observations	1	24	48	72	4	7	10
Corneal Opacity	3/3	3/3	3/3	3/3	3/3	3/3	0/3
Iritis	3/3	3/3	3/3	3/3	3/3	0/3	0/3
Conjunctivae:							
Redness	3/3	3/3	3/3	3/3	3/3	1/3	0/3
Chemosis	3/3	3/3	3/3	0/3	0/3	0/3	0/3
Discharge	3/3	3/3	3/3	3/3	0/3	0/3	0/3

*Score of 2 or more required to be considered "positive."

A. Observations - From one hour through 48 hours, corneal opacity, iritis and conjunctivitis were noted in all three eyes. The corneal opacity and conjunctivitis persisted through day 7 resolving by day 10. The iritis resolved by day 7. All eyes were free of irritation by day 10.

B. Reviewer's Conclusions: We agree with the study author that Glyphosate Acid Technical is severely irritating to the eye.

Reviewer: Eugenia McAndrew **Date:** April 20, 2006
Risk Manager: 25

STUDY TYPE: Primary Dermal Irritation - Rabbit; OPPTS 870.2500; OECD 404

TEST MATERIAL: Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder)

CITATION: Merkel, D. Glyphosate Acid Technical. Primary Skin Irritation Study in Rabbits. Product Safety Laboratories, Dayton, New Jersey. Laboratory Study Number 15278. April 4, 2005. MRID 46760509 Unpublished.

SPONSOR: Zhejiang Xinan Chemical Industrial Group Co., Inc., No. 93 Baisha Road, Jiande, Zhejiang Province, 31160, People's Republic of China

EXECUTIVE SUMMARY: In a primary dermal irritation study (MRID 46760509), three young adult New Zealand albino female rabbits (Source: Robinson Services, Clemmons, NC) were dermally exposed to Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder). "In order to insure adequate contact with the skin, the sample was applied as a dry paste (70% w/w mixture in distilled water). Preliminary sample preparation conducted by PSL indicated mixtures in excess of 70% (i.e., 75-90%) were too dry to insure adequate contact with the skin." Five-tenths of a gram of the test substance was placed on a 1 inch by 1 inch gauze pad and applied to one 6 cm^2 intact dose site on each animal for a period of four hours. Test sites were wrapped with semi-occlusive tape. Animals were then observed at 1, 24, 48 and 72 hours after patch removal. Irritation was scored by the method of Draize.

Primary Dermal Irritation Index (PDII) = 0.1 Two sites exhibited no irritation during the study. One hour after patch removal, one site exhibited very slight erythema. At 24 hours, this site was free from irritation.

In this study, formulation is slightly irritating. EPA Toxicity Category IV.

This study is classified as Acceptable. It does satisfy the guideline requirement for a primary dermal irritation study (OPPTS 870.2500; OECD 404) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance, and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

INDIVIDUAL SKIN IRRITATION

ERYTHEMA/EDEMA

Animal No.	Sex	Hours After Patch Removal			
		1	24	48	72
11807	M	0/0	0/0	0/0	0/0
11808	M	1/0	0/0	0/0	0/0
11809	M	0/0	0/0	0/0	0/0

A. Observations - Two sites exhibited no irritation during the study. One hour after patch removal, one site exhibited very slight erythema. At 24 hours, this site was free from irritation.

B. Results - Primary Dermal Irritation Index (PDII) = 0.1

C. Reviewer's Conclusions: We agree with the study author that Glyphosate Acid Technical is slightly irritating to the skin.

Reviewer: Eugenia McAndrew **Date:** April 20, 2006
Risk Manager: 25

STUDY TYPE: Dermal Sensitization - Guinea Pig; OPPTS 870.2600; OECD 406

TEST MATERIAL: Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder)

CITATION: Merkel, D. Glyphosate Acid Technical. Dermal Sensitization Study in Guinea Pigs (Buehler Method). Product Safety Laboratories, Dayton, New Jersey. Laboratory Study Number 15279. April 4, 2005. MRID 46760510 Unpublished.

SPONSOR: Zhejiang Xinan Chemical Industrial Group Co., Inc., No. 93 Baisha Road, Jiande, Zhejiang Province, 31160, People's Republic of China

EXECUTIVE SUMMARY: In a dermal sensitization study (MRID 46760510) with Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder), 30 Hartley albino male guinea pigs (Source: Elm Hill Breeding Labs, Chelmsford, MA; 327-391 g) were tested using the Buehler method. The procedures were validated using alpha-Hexylcinnamaldehyde (HCA) as the positive control substance.

Once each week for three weeks, 0.4 gram of a 70% w/w mixture of the test substance in distilled water was applied to the left side of 20 test animals for a 6-hour exposure period for a total of three exposures. Readings were made 24 and 48 hours after each induction application. The animals were left untreated for two weeks. For the challenge 27 days after the first induction, 0.4 gram of a 70% w/w mixture of the test substance in distilled water (the highest non-irritating concentration) was applied to a naive site on each test animal for a 6-hour challenge exposure. Ten naive control guinea pigs were treated with the 70% w/w mixture of the test substance in distilled water at challenge only. Readings were made at 24 and 48 hours after the exposure period.

In this study, formulation is not a dermal sensitizer.

Very faint erythema (0.5) was noted at 16/20 test animal sites during the induction phase. Following the challenge, very faint erythema (0.5) was observed at 6/20 test animal sites at 24 hours persisting at one site at 48 hours. In the naive control group, very faint erythema (0.5) was noted at 2/10 sites at 24 hours only. No positive responses were noted in either the test or naïve control animals.

This study is classified as Acceptable. It does satisfy the guideline requirement for a dermal sensitization study (OPPTS 870.2600; OECD 406) in the Guinea pig.

COMPLIANCE: Signed and dated GLP, Quality Assurance, and Data Confidentiality statements were provided.

ACUTE TOX ONE-LINERS

1. **DP BARCODE:** D327140
2. **PC CODES:** 417300
3. **CURRENT DATE:** 20/APR/2006
4. **TEST MATERIAL:** Glyphosate Acid Technical (Sample ID No. 040205; 97.23 % glyphosate acid; white crystalline powder)

Study/Species/Lab Study # /Date	MRID	Results	Tox. Cat.	Core Grade
Acute oral toxicity / rat Product Safety Lab 15274/04-04-05	46760505	LD_{50} > 5000 mg/kg (females)	IV	A
Acute dermal toxicity / rat Product Safety Lab 15275/04-04-05	46760506	LD_{50} > 5000 mg/kg (males and females)	IV	A
Acute inhalation toxicity / rat Product Safety Lab 15276/04-04-05	46760507	LC_{50} > 2.04 mg/L (males and females)	IV	A
Primary eye irritation / rabbit Product Safety Lab 15277/04-04-05	46760508	Corneal opacity, iritis and conjunctivitis in 3/3 eyes resolving by day 10.	II	A
Primary dermal irritation / rabbit Product Safety Lab 15278/04-04-05	46760509	PDII = 0.1 Very slight erythema at 1/3 sites at one hour only. No other irritation noted.	IV	A
Dermal sensitization / guinea pig Product Safety Lab 15279/04-04-05	46760510	Not a sensitizer	--	A

Core Grade Key: A =Acceptable, S = Supplementary, U = Unacceptable, W = Waived

BIOLOGIC INC.
agribusiness professionals

January 26, 2006

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 226A, Crystal Mall II
1801 South Bell Street
Arlington, Virginia 22202-4501

ATTN: Mr. James A. Tompkins
Product Manager – PM Team 25

SUBJECT: "Glyphosate Acid Technical"; EPA File Symbol: 73432-(to be assigned).

Dear Mr. Tompkin:

With this letter, we are submitting an application on behalf of Zhejiang Xinan Chemical Industrial Group Company, Ltd. for the registration of "Glyphosate Acid Technical". Please be advised that this application is submitted as a me-too registration, and is supported by the cite-all option and in accordance with FIFRA 3(c)(1)(D).

In order for the Agency to make its determination of substantial similarity, and to facilitate the processing of this application, please find the following enclosures:

1. Administrative Materials:

- Transmittal Letter
- Application for Pesticide Registration; (EPA Form 8570-1)
- Data Matrix; (EPA Form 8570-35)
- Confidential Statement of Formula; (EPA Form 8570-4)
- Draft Labeling; (Five Copies)

2. Manufacturing Process (Three Copies):

- Product Identity and Composition; (OPPTS 830.1550)
- Description of Materials Used to Produce the Product; (OPPTS 830.1600)
- Description of Production Process; (OPPTS 830.1620)
- Discussion of Formation of Impurities; (OPPTS 830.1670)

3. Five Batch Analysis (Three Copies); Volumes 1 - 7:

- Preliminary Analysis; (OPPTS 830.1700)
- Certified Limits; (OPPTS 830.1750)
- Enforcement Analytical Methods (OPPTS 830.1800)

115 Obtuse Hill • Brookfield, Connecticut 06804 • USA
Voice: 203.740.1200 • Fax: 203.740.1220 • Email: lmiller@biologicconsulting.com

4. Physical and Chemical Properties (Three Copies):

- Color; (OPPTS 830.6302)
- Physical State; (OPPTS 830.6303)
- Odor; (OPPTS 830.6304)
- pH; (OPPTS 830.7000)
- UV/Visible Absorption (OPPTS 830.7050)
- Melting Point (OPPTS 830.7200)
- Dissociation Constant (OPPTS 830.7370)
- Density, Specific Gravity, Bulk Density (OPPTS 830.7300)
- Partition Coefficient (OPPTS 830.7550/7560/7570)
- Water Solubility (OPPTS 830.7840/7860)
- Vapor Pressure (OPPTS 830.7950)

5. Physical and Chemical Properties (Three Copies):

- Stability to Normal/Elevated Temperatures, Metals, and Metal Ions; (OPPTS 830.6313)
- Oxidation/Reduction Reaction (OPPTS 830.6314)

6. Acute Oral Toxicity (Three Copies):

- Acute Oral Toxicity Up and Down Procedure in Rats; (OPPTS 830.1100)

7. Acute Dermal Toxicity (Three Copies):

- Acute Dermal Toxicity in Rats – Limit Test; (OPPTS 830.1200)

8. Acute Inhalation Toxicity (Three Copies):

- Acute Inhalation Toxicity in Rats – Limit Test; (OPPTS 830.1300)

9. Eye Irritation (Three Copies):

- Primary Eye Irritation Study in Rabbits; (OPPTS 830.2400)

10. Skin Irritation (Three Copies):

- Primary Skin Irritation Study in Rabbits; (OPPTS 830.2500)

11. Dermal Sensitization (Three Copies):

- Dermal Sensitization Study in Guinea Pigs – Buehler Method; (OPPTS 830.2600)

We believe the above items of data are sufficient to support this application for a technical grade active ingredient. Any data requirements deemed as irrelevant are indicated by the appropriate footnotes in the data matrix.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 15, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-364894
EPA File Symbol or Registration Number: 73432-R
Product Name: GLYPHOSATE ACID TECHNICAL
EPA Receipt Date: 10-Feb-2006
EPA Company Number: 73432
Company Name: ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO. LTD

LAWRENCE A. MILLER
BIOLOGIC, INC.
ZHEJIANG XINAN CHEMICAL INDUSTRIAL GROUP CO. LTD
115 OBTUSE HILL
BROOKFIELD, CT 06804-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R31

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: $ 4,200 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:
U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how th request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,

Front End Processing Staff
Information Technology & Resources Management Division

Page 73 is not included in this copy.

Pages _____ through _____ are not included in this copy.

The material not included contains the following type of information:

_____ Identity of product inert ingredients.

__X__ Identity of product impurities.

__X__ Description of the product manufacturing process.

__X__ Description of quality control procedures.

__X__ Identity of the source of product ingredients.

_____ Sales or other commercial/financial information.

_____ A draft product label.

__X__ The product confidential statement of formula.

_____ Information about a pending registration action.

__X__ FIFRA registration data.

__X__ The document is a duplicate of page(s) _____.

_____ The document is not responsive to the request.

__X__ Internal deliberative information.

__X__ Privileged attorney-client communication.

__X__ Claimed Confidential by submitter upon submission to the Agency.